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| 5           | ghill@wilkinsonstekloff.com<br>Anastasia M. Pastan (pro hac vice)  |  |  |  |  |
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| 10          | Bambo Obaro  |  |  |  |  |
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| 12          |  |  |  |  |  |
| 13          | Telephone: (650) 802-3083  |  |  |  |  |
| 14          | Counsel for Microsoft Corporation  |  |  |  |  |
| 15          | [Additional Counsel Identified on Signature Page]  |  |  |  |  |
| 16          |  |  |  |  |  |
| 17          | UNITED STATES  | DISTRICT COURT   |  |  |  |
| 18          | FOR THE NORTHERN D   | ISTRICT OF CALIFORNIA  |  |  |  |
| 19          | SAN FRANCI   | SCO DIVISION   |  |  |  |
| 20          | FEDERAL TRADE COMMISSION,  | Case No. 3:23-cv-02880-JSC   |  |  |  |
| 21          | Plaintiff,   | AMENDED ADMINISTRATIVE MOTION                                      |  |  |  |
| 22          | v.   | SEEKING <i>IN CAMERA</i> TREATMENT OF CERTAIN EXHIBITS PURSUANT TO |  |  |  |
| 23          | MICROSOFT CORPORATION and  | CIVIL L.R. 7-11 AND 79-5   |  |  |  |
| 24          | ACTIVISION BLIZZARD, INC.,   | Date: TBA Time: TBA  |  |  |  |
| 25          | Defendants.  | Dept.: Courtroom 8—19th Floor                                      |  |  |  |
| 26          |  | Judge: Honorable Jacqueline S. Corley                              |  |  |  |
| 27          |  |  |  |  |  |
| 28          |  |  |  |  |  |

CASE No. 3:23-CV-02880-JSC

Pursuant to Civil Local Rules 7-11 and 79-5 and the June 14th Order Re: Evidentiary Hearing on Preliminary Injunction Motion (ECF No. 76) ("Order"), Defendant Microsoft Corporation ("Microsoft") respectfully moves this Court to seal from public disclosure, permit *in camera* treatment, and close the courtroom for the presentation of certain exhibits that appear on Plaintiff Federal Trade Commission ("FTC") and Defendants' (collectively, the "Parties") exhibit lists filed June 20, 2023, and the FTC's supplemental exhibit list filed June 21, 2023.

On June 14, 2023, the Court issued an Order directing the Parties, among other things, to identify "each exhibit each party intends to offer at the evidentiary hearing either through a witness declaration or live testimony," including "which exhibits are subject to a confidentiality designation and where on the docket the Court can locate a declaration in support of sealing as required by Local Rule 79-5." Order, at Section A.2. On June 19, 2023, the Parties exchanged their respective exhibit lists, which identify exhibits that the Parties plan to introduce during the evidentiary hearing. Some of these exhibits reveal highly sensitive and proprietary business information that could be used to injure Microsoft if made publicly available. Microsoft filed an Administrative Motion seeking *in camera* treatment of certain exhibits on June 20, 2023 (ECF No. 150). The parties continue to refine their exhibit lists and the appropriate confidentiality designations of these exhibits, and Microsoft hereby files this Amended Administrative Motion to reflect the current status of Microsoft's requests for *in camera* treatment of exhibits.

Below, Microsoft has identified highly confidential material found in the exhibits mentioned in the Parties' exhibit lists, along with the specific bases for sealing required under Local Rule 79-5. The proposed sealing reflects Microsoft's good-faith efforts to narrowly seek sealing of only that information which is competitively sensitive and contained in internal documents, the public disclosure of which would cause injury to Microsoft that cannot be avoided through any more restrictive alternative means:

CASE No. 3:23-CV-02880-JSC

| 1<br>2<br>3           | Document | Party Seeking<br>to Introduce<br>Exhibit                 | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|-----------------------|----------|--|--|--|
| 4                     |          | FTC's Exhibit  | List and Defendant   | s' Exhibit List  |
| 5<br>6<br>7<br>8<br>9 | PX1442   | FTC's Exhibit<br>List and<br>Defendants'<br>Exhibit List | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities which could be used to injure Microsoft if made publicly available.      |
| 0<br>1<br>2<br>3      | PX1823   | FTC's Exhibit<br>List and<br>Defendants'<br>Exhibit      | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to investment decisions, which could be used to injure Microsoft if made publicly available.                                      |
| 5<br>5<br>6<br>7      | PX1102   | FTC's Exhibit<br>List and<br>Defendants'<br>Exhibit List | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to business partnerships and revenue figures and projections, which could be used to injure Microsoft if made publicly available. |
| 8<br>9<br>0<br>1      | PX4352   | FTC's Exhibit<br>List and<br>Defendants'<br>Exhibit List | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.                           |
| 2<br>3<br>4           |          | j  |  |  |

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<sup>&</sup>lt;sup>1</sup> Legitimate private interests warrant *in camera* treatment of Microsoft information in this chart, and the unsealing of the information would result in injury to Microsoft that cannot be avoided through any less restrictive alternative to sealing the courtroom.

| $\begin{bmatrix} 1 \\ 2 \end{bmatrix}$ | Document      | Party Seeking to Introduce  | Information<br>Requested for <i>In</i> | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|--|---------------|-----------------------------|--|--|
| 3                                      |               | Exhibit                     | Camera<br>Treatment                    |  |
| 4                                      | PX1063/RX5025 | FTC's Exhibit<br>List and   | Document<br>Withheld                   | This portion contains non-public and highly sensitive information  |
| 5                                      |               | Defendants'<br>Exhibit List |  | including, but not limited to assessment of the competitive  |
| 6                                      |               |                             |  | landscape, which could be used to injure Microsoft if made publicly                                      |
| 7                                      |               |                             |  | available.   |
| 8                                      |               |                             |  |  |
| 9                                      |               |                             |  |  |
| 10                                     |               |                             |  |  |
| 11                                     | PX1782/RX2170 | FTC's Exhibit               | Document                               | This parties contains non public and   |
| 12                                     | PA1/82/RA21/0 | List and Defendants'        | Withheld                               | This portion contains non-public and highly sensitive information including, but not limited to terms of |
| 13                                     |               | Exhibit List                |  | existing confidential agreements, which could be used to injure  |
| 14                                     |               |                             |  | Microsoft if made publicly available.  |
| 15                                     |               |                             |  |  |
| 16                                     |               |                             |  |  |
| 17                                     |               |                             |  |  |
| 18                                     |               |                             |  |  |
| 19                                     | PX1779/RX1212 | FTC's Exhibit               | Document                               | This portion contains non-public and   |
| 20                                     |               | List and Defendants'        | Withheld                               | highly sensitive information including, but not limited to terms of                                      |
| 21                                     |               | Exhibit List                |  | existing confidential agreements, which could be used to injure  |
| 22                                     |               |                             |  | Microsoft if made publicly available.  |
| 23                                     |               |                             |  |  |
| 24                                     |               |                             |  |  |
| 25<br>26                               |               |                             |  |  |
| 27                                     |               |                             |  |  |
| 41                                     |               |                             |  |  |

| 1<br>2<br>3 | Document      | Party Seeking<br>to Introduce<br>Exhibit | Information Requested for In Camera Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|-------------|---------------|--|---|---|
| 4           | PX1784/RX1213 | FTC's Exhibit<br>List and                | Document<br>Withheld                          | This portion contains non-public and highly sensitive information                                       |
| 5           |               | Defendants' Exhibit List                 | Withheld                                      | including, but not limited to terms of existing confidential agreements,                                |
| 6           |               | Exmott Eist                              |   | which could be used to injure Microsoft if made publicly available.                                     |
| 7           |               |  |   | Tricrosoft if made paonery available.   |
| 8           |               |  |   |   |
| 9           |               |  |   |   |
| 10          |               |  |   |   |
| 11          |               |  |   |   |
| 12          | RX1159/PX1217 | FTC's Exhibit<br>List and                | Redacted Version<br>Forthcoming               | This portion contains non-public and highly sensitive information                                       |
| 13          |               | Defendants'<br>Exhibit List              |   | including, but not limited to, strategic evaluation of forward-looking                                  |
| 14          |               |  |   | opportunities, revenue figures and projections, and investment decisions, which could be used to injure |
| 15          |               |  |   | Microsoft if made publicly available.   |
| 16          |               |  |   |   |
| 17          |               |  |   |   |
| 18          |               |  |   |   |
| 19          |               |  | FTC's Exhibit List                            |   |
| 20          | PX4484        | FTC's Exhibit                            | Document                                      | This portion contains non-public and  |
| 21          |               | List                                     | Withheld                                      | highly sensitive information including, but not limited to strategic                                    |
| 22          |               |  |   | evaluation of forward-looking opportunities, which could be used to                                     |
| 23<br>24    |               |  |   | injure Microsoft if made publicly   |
| 25          |               |  |   | available.  |
| 26          |               |  |   |   |
| 27          |               |  |   |   |
| - /         |               |  |   |   |

| 1 2      | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i> | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>                   |
|----------|----------|--|---|---|
| 3        |          |  | Treatment   |   |
| 4        | PX1089   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                         | This portion contains non-public and highly sensitive information           |
| 5        |          | List                                     | Tortheolining   | including, but not limited to business partnerships, which could be used to |
| 6<br>7   |          |  |   | injure Microsoft if made publicly available.                                |
| 8        | PX1951   | FTC's Exhibit                            | Redacted Version  | This portion contains non-public and  |
| 9        |          | List                                     | Forthcoming   | highly sensitive information including, but not limited to business         |
| 10       |          |  |   | partnerships, which could be used to injure Microsoft if made publicly      |
| 11       |          |  |   | available.  |
| 12       | PX1074   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                         | This portion contains non-public and highly sensitive information           |
| 13       |          |  | 1 orune oruning   | including, but not limited to strategic evaluation of forward-looking       |
| 14       |          |  |   | opportunities, which could be used to                                       |
| 15       |          |  |   | injure Microsoft if made publicly available.                                |
| 16       | PX1075   | FTC's Exhibit                            | Redacted Version  | This portion contains non-public and  |
| 17       |          | List                                     | Forthcoming   | highly sensitive information including, but not limited to revenue          |
| 18       |          |  |   | figures and projections, which could be used to injure Microsoft if made    |
| 19       |          |  |   | publicly available.   |
| 20       | PX1742   | FTC's Exhibit<br>List                    | Document<br>Withheld                                    | This portion contains non-public and highly sensitive information           |
| 21       |          | List                                     | Withheld  | including, but not limited to business                                      |
| 22       |          |  |   | partnerships, which could be used to injure Microsoft if made publicly      |
| 23       |          |  |   | available.  |
| 24       | PX4361   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                         | This portion contains non-public and highly sensitive information           |
| 25       |          |  | 6   | including, but not limited to business partnerships, which could be used to |
| 26<br>27 |          |  |   | injure Microsoft if made publicly   |
| 28       |          |  |   | available.  |

| 1<br>2<br>3 | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|-------------|----------|--|--|--|
| 4           | PX1070   | FTC's Exhibit                            | Redacted Version   | This portion contains non-public and   |
| 5<br>6<br>7 |          | List                                     | Forthcoming  | highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly |
| 8           |          |  |  | available.   |
| 9           | PX4622   | FTC's Exhibit<br>List                    | Redacted Version Forthcoming   | This portion contains non-public and highly sensitive information  |
|             |          | Dist                                     | Totaleoming  | including, but not limited to internal   |
| 10          |          |  |  | decision-making processes, which could be used to injure Microsoft if  |
| 11          |          |  |  | made publicly available.   |
| 12<br>13    | PX4347   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to internal   |
| 14          |          |  |  | decision-making processes, which   |
| 15          |          |  |  | could be used to injure Microsoft if made publicly available.  |
| 16          | PX1571   | FTC's Exhibit                            | Redacted Version   | This portion contains non-public and   |
| 17<br>18    |          | List                                     | Forthcoming  | highly sensitive information including, but not limited to internal decision- making process, which  |
| 19          |          |  |  | could be used to injure Microsoft if made publicly available.  |
| 20          | PX1721   | FTC's Exhibit                            | Document   | This portion contains non-public and   |
| 21          |          | List                                     | Withheld   | highly sensitive information including, but not limited to internal  |
| 22          |          |  |  | decision-making processes, which could be used to injure Microsoft if  |
| 23          |          |  |  | made publicly available.   |
| 24          | PX4301   | FTC's Exhibit                            | Redacted Version   | This portion contains non-public and   |
| 25          |          | List                                     | Forthcoming  | highly sensitive information including, but not limited to strategic   |
| 26          |          |  |  | evaluation of forward-looking opportunities, which could be used to  |
| 27          |          |  |  | injure Microsoft if made publicly available.   |
| 28          |          |  |  |  |

| 1<br>2<br>3  | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|--|----------|--|--|--|
| 4<br>5<br>6<br>7   | PX1116   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to investment decisions, which could be used to injure Microsoft if made publicly available.                                  |
| 8<br>9<br>10<br>11   | PX4303   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available. |
| 12<br>13<br>14<br>15   | PX1136   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to investment decisions, which could be used to injure Microsoft if made publicly available.                                  |
| <ul><li>16</li><li>17</li><li>18</li><li>19</li></ul>            | PX4007   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.                       |
| <ul><li>20</li><li>21</li><li>22</li><li>23</li><li>24</li></ul> | PX1891   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.               |
| 25<br>26<br>27<br>28   | PX1639   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.                       |

| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|--|--|---|
| PX1635   | FTC's Exhibit<br>List                    | Document   | This portion contains non-public ar   |
|          | List                                     | Withheld   | highly sensitive information including, but not limited to revenu figures and projections and           |
|          |  |  | assessments of the competitive landscape, which could be used to  |
|          |  |  | injure Microsoft if made publicly available.  |
| DV1465   | FTC's Exhibit                            | Document   |   |
| PX1465   | List Exhibit                             | Withheld   | This portion contains non-public are highly sensitive information including, but not limited to revenue |
|          |  |  | figures and projections, which could  |
|          |  |  | be used to injure Microsoft if made publicly available.   |
| PX1145   | FTC's Exhibit<br>List                    | Redacted Version   | This portion contains non-public an   |
|          | List                                     | Forthcoming  | highly sensitive information including, but not limited to revenu figures and projections, which could  |
|          |  |  | be used to injure Microsoft if made publicly available.   |
| PX1023   | FTC's Exhibit                            | Redacted Version   | This portion contains non-public ar   |
|          | List                                     | Forthcoming  | highly sensitive information including, but not limited to revenu                                       |
|          |  |  | figures and projections, which could  |
|          |  |  | be used to injure Microsoft if made publicly available.   |
| PX1024   | FTC's Exhibit                            | Document   | This portion contains non-public ar   |
|          | List                                     | Withheld   | highly sensitive information including, but not limited to strateg                                      |
|          |  |  | evaluation of forward-looking opportunities and investment  |
|          |  |  | decisions, which could be used to injure Microsoft if made publicly                                     |
|          |  |  | available.  |
|          |  |  |   |

| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|----------|--|--|--|
| PX4617   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to internal presentations discussing business strategy and strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available. |
| PX4430   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.                                 |
| PX4358   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.   |
| PX4359   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.   |
| PX4312   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.   |

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| 1 2 | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i> | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>                  |
|-----|----------|--|---|--|
| 3   |          |  | Treatment   |  |
| 4   | PX4362   | FTC's Exhibit<br>List                    | Document<br>Withheld                                    | This portion contains non-public and highly sensitive information          |
| 5   |          |  |   | including, but not limited to revenue figures and projections, which could |
| 6   |          |  |   | be used to injure Microsoft if made  |
| 7   |          |  |   | publicly available.  |
| 8   | PX4319   | FTC's Exhibit<br>List                    | Document Withheld                                       | This portion contains non-public and highly sensitive information          |
| 9   |          |  |   | including, but not limited to revenue figures and projections, which could |
| 10  |          |  |   | be used to injure Microsoft if made  |
| 11  |          |  |   | publicly available.  |
| 12  | PX1393   | FTC's Exhibit<br>List                    | Document Withheld                                       | This portion contains non-public and highly sensitive information          |
| 13  |          |  |   | including, but not limited to revenue figures and projections and internal |
| 14  |          |  |   | decision-making processes which could be used to injure Microsoft if       |
| 15  |          |  |   | made publicly available.   |
| 16  | PX1884   | FTC's Exhibit                            | Redacted Version  | This portion contains non-public and                                       |
| 17  |          | List                                     | Forthcoming   | highly sensitive information including, but not limited to                 |
| 18  |          |  |   | assessment of the competitive landscape, which could be used to            |
| 19  |          |  |   | injure Microsoft if made publicly available.                               |
| 20  | DV 4277  | ETC!- E-1:1:4                            | Decreased   |  |
| 21  | PX4377   | FTC's Exhibit<br>List                    | Document<br>Withheld                                    | This portion contains non-public and highly sensitive information          |
| 22  |          |  |   | including, but not limited to strategic evaluation of forward-looking      |
| 23  |          |  |   | opportunities, internal decision-<br>making processes, and business        |
| 24  |          |  |   | partnerships, which could be used to                                       |
| 25  |          |  |   | injure Microsoft if made publicly available.                               |
| 26  |          |  |   |  |
| 27  |          |  |   |  |

| 1<br>2<br>3  | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|--|----------|--|--|--|
| 4<br>5<br>6<br>7   | PX1883   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.                               |
| 8<br>9<br>10<br>11   | PX1494   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.                  |
| 12<br>13<br>14<br>15   | PX1110   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available. |
| <ul><li>16</li><li>17</li><li>18</li><li>19</li></ul>            | PX4378   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.                               |
| <ul><li>20</li><li>21</li><li>22</li><li>23</li></ul>            | PX1080   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.                  |
| <ul><li>24</li><li>25</li><li>26</li><li>27</li><li>28</li></ul> | PX1039   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.                  |

| 1 2      | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br>Camera | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>                   |
|----------|----------|--|--|---|
| 3        |          |  | Treatment  |   |
| 4        | PX4271   | FTC's Exhibit<br>List                    | Redacted Version Forthcoming                     | This portion contains non-public and highly sensitive information           |
| 5        |          |  | 1 cruis cruing                                   | including, but not limited to internal decision-making processes, which     |
| 6<br>7   |          |  |  | could be used to injure Microsoft if made publicly available.               |
| 8        | PX1245   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                  | This portion contains non-public and highly sensitive information           |
| 9        |          | Dist                                     | Tortheoming                                      | including, but not limited to   |
| 10       |          |  |  | assessment of the competitive landscape and                                 |
| 11       |          |  |  | business partnerships, which could be used to injure Microsoft if made      |
| 12       |          |  |  | publicly available.   |
| 13       | PX1260   | FTC's Exhibit<br>List                    | Document<br>Withheld                             | This portion contains non-public and highly sensitive information           |
| 14       |          |  |  | including, but not limited to assessment of the competitive                 |
| 15<br>16 |          |  |  | landscape, which could be used to injure Microsoft if made publicly         |
| 17       |          |  |  | available.  |
| 18       | PX4372   | FTC's Exhibit<br>List                    | Redacted Version Forthcoming                     | This portion contains non-public and highly sensitive information           |
| 19       |          |  |  | including, but not limited to business partnerships, which could be used to |
| 20       |          |  |  | injure Microsoft if made publicly available.                                |
| 21       | DV/4222  | ETCL F-1.11.4                            | Decrees  |   |
| 22       | PX4322   | FTC's Exhibit<br>List                    | Document<br>Withheld                             | This portion contains non-public and highly sensitive information           |
| 23       |          |  |  | including, but not limited to strategic evaluation of forward-looking       |
| 24       |          |  |  | opportunities, which could be used to injure Microsoft if made publicly     |
| 25       |          |  |  | available.  |
| 26       |          |  | 1  | 1   |
| 27       |          |  |  |   |

| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for In Camera Treatment<br>Request <sup>1</sup>  |
|----------|--|--|--|
| PX4323   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes, which could be used to injure Microsoft if made publicly available.                              |
| PX4325   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.                                 |
| PX1514   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape and business partnerships, which could bused to injure Microsoft if made publicly available. |
| PX1516   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.                                 |
| PX1049   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.                         |

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| 1<br>2<br>3                | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|----------------------------|----------|--|--|--|
| 4<br>5<br>6<br>7<br>8      | PX1050   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to internal presentations discussing business strategy and strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available. |
| 9<br>10<br>11<br>12        | PX1310   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.   |
| 13<br>14<br>15<br>16       | PX4351   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly available.   |
| 17<br>18<br>19<br>20       | PX1851   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.   |
| 21<br>22<br>23<br>24<br>25 | PX1636   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.   |
| 26                         |          |  |  |  |

| 1 2 3    | Document | Party Seeking<br>to Introduce<br>Exhibit | Information Requested for <i>In</i> Camera Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|----------|--|--|---|
|          | PX1486   | FTC's Exhibit                            | Redacted Version                                     | This portion contains non-public and  |
| 5        |          | List                                     | Forthcoming  | highly sensitive information including, but not limited to strategic evaluation of forward-looking                |
| 6<br>7   |          |  |  | opportunities, which could be used to injure Microsoft if made publicly available.                                |
| 8        | PX1979   | FTC's Exhibit                            | Decreased  |   |
| 9        | PX1979   | List                                     | Document<br>Withheld                                 | This portion contains non-public and highly sensitive information including, but not limited to strategic         |
| 10       |          |  |  | evaluation of forward-looking opportunities, which could be used to   |
| 11       |          |  |  | injure Microsoft if made publicly   |
| 12       |          |  |  | available.  |
| 13       | PX1805   | FTC's Exhibit<br>List                    | Document Withheld                                    | This portion contains non-public and highly sensitive information   |
| 14<br>15 |          |  |  | including, but not limited to strategic<br>evaluation of forward-looking<br>opportunities, which could be used to |
| 16       |          |  |  | injure Microsoft if made publicly available.  |
| 17       | PX1177   | FTC's Exhibit                            | Document   | This portion contains non-public and  |
| 18       |          | List                                     | Withheld   | highly sensitive information including, but not limited to  |
| 19       |          |  |  | investment decisions and terms of   |
| 20       |          |  |  | existing confidential agreements, which could be used to injure   |
| 21       |          |  |  | Microsoft if made publicly available.   |
| 22       | PX1538   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                      | This portion contains non-public and highly sensitive information   |
| 23       |          | List                                     | Torulcommig  | including, but not limited to strategic   |
| 24       |          |  |  | evaluation of forward-looking opportunities and internal  |
| 25       |          |  |  | presentations discussing business strategy, which could be used to  |
| 26       |          |  |  | injure Microsoft if made publicly available.  |
| 27       |          |  |  | avanaoic.   |
|          | 1        |  |  |   |

|                                 |          |  |  | 1   |
|---------------------------------|----------|--|--|---|
| 1<br>2<br>3                     | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>                         |
| 4                               | PX1877   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information                 |
| 5                               |          |  | 1 orung  | including, but not limited to internal presentations discussing business          |
| 6                               |          |  |  | strategy, which could be used to injure Microsoft if made publicly                |
| 7                               |          |  |  | available.  |
| 8                               | PX1638   | FTC's Exhibit<br>List                    | Redacted Version   | This portion contains non-public and  |
| 9                               |          | List                                     | Forthcoming  | highly sensitive information including, but not limited to strategic              |
| 10<br>11                        |          |  |  | evaluation of forward-looking opportunities, which could be used to               |
| 12                              |          |  |  | injure Microsoft if made publicly available.                                      |
| 13                              | PX1154   | FTC's Exhibit                            | Document   | This portion contains non-public and  |
| 14                              |          | List                                     | Withheld   | highly sensitive information including, but not limited to business               |
| 15<br>16                        |          |  |  | partnerships, which could be used to injure Microsoft if made publicly available. |
| 17                              | PX1471   | FTC's Exhibit                            | Redacted Version   | This portion contains non-public and  |
| 18                              |          | List                                     | Forthcoming  | highly sensitive information including, but not limited to internal               |
| 19                              |          |  |  | decision-making processes, which could be used to injure Microsoft if             |
| 20                              |          |  |  | made publicly available.  |
| 21                              | PX1065   | FTC's Exhibit                            | Redacted Version   | This portion contains non-public and  |
| 22                              |          | List                                     | Forthcoming  | highly sensitive information including, but not limited to                        |
| 23                              |          |  |  | investment decisions, which could be used to injure Microsoft if made             |
| 24                              |          |  |  | publicly available.   |
| <ul><li>25</li><li>26</li></ul> |          |  |  |   |
| 27                              |          |  |  |   |
| <i>- 1</i>                      |          |  |  |   |

| Document       | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>                  |
|----------------|--|--|--|
| PX4435         | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information          |
|                | List                                     | withheid   | including, but not limited to revenue figures and projections, which could |
|                |  |  | be used to injure Microsoft if made publicly available.                    |
| PX4419         | FTC's Exhibit                            | Redacted Version   | This portion contains non-public and                                       |
|                | List                                     | Forthcoming  | highly sensitive information including, but not limited to internal        |
|                |  |  | decision-making process and business partnerships, which could be used to  |
|                |  |  | injure Microsoft if made publicly available.                               |
| PX1313         | FTC's Exhibit                            | Document   | This portion contains non-public and                                       |
|                | List                                     | Withheld   | highly sensitive information including, but not limited to                 |
|                |  |  | investment decisions and revenue figures and projections, which could      |
|                |  |  | be used to injure Microsoft if made publicly available.                    |
| PX4329/PX4329A | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and                                       |
|                | List                                     | withheid   | highly sensitive information including, but not limited to internal        |
|                |  |  | decision-making processes, which could be used to injure Microsoft if      |
|                |  |  | made publicly available.   |
| PX4334         | FTC's Exhibit                            | Redacted Version   | This portion contains non-public and                                       |
| 1 74334        | List                                     | Forthcoming  | highly sensitive information including, but not limited to internal        |
|                |  |  | decision-making processes, which could be used to injure Microsoft if      |
|                |  |  | made publicly available.   |
|                |  |  |  |

AMENDED ADMIN MOTION SEEKING IN CAMERA TREATMENT

| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>                |
|----------|--|--|--|
| PX1391   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information        |
|          | List                                     | Tormcoming   | including, but not limited to internal decision-making processes and     |
|          |  |  | assessment of the competitive landscape, which could be used to          |
|          |  |  | injure Microsoft if made publicly available.                             |
| PX4367   | FTC's Exhibit                            | Redacted Version   | This portion contains non-public and                                     |
|          | List                                     | Forthcoming  | highly sensitive information including, but not limited to revenue       |
|          |  |  | figures and projections, which could be used to injure Microsoft if made |
|          |  |  | publicly available.  |
| PX1624   | FTC's Exhibit<br>List                    | Redacted Version Forthcoming   | This portion contains non-public and highly sensitive information        |
|          |  |  | including, but not limited to internal presentations discussing business |
|          |  |  | strategy, which could be used to injure Microsoft if made publicly       |
|          |  |  | available.   |
| PX4380   | FTC's Exhibit<br>List                    | Redacted Version Forthcoming   | This portion contains non-public and highly sensitive information        |
|          |  |  | including, but not limited to assessment of the competitive              |
|          |  |  | landscape, which could be used to injure Microsoft if made publicly      |
|          |  |  | available.   |
| PX1895   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information        |
|          |  |  | including, but not limited to internal decision-making processes, which  |
|          |  |  | could be used to injure Microsoft if                                     |
|          |  |  | made publicly available.   |

| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|----------|--|--|--|
| PX1366   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to business partnerships and terms of existing confidential agreements, which could be used to injure Microsoft if made |
|          |  |  | publicly available.  |
| PX1157   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made                                     |
|          |  |  | publicly available.  |
| PX1072   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to strategic  |
|          |  |  | evaluation of forward-looking opportunities and business partnerships, which could be used to injure Microsoft if made publicly available.   |
|          |  |  |  |
| PX1170   | FTC's Exhibit<br>List                    | Document Withheld  | This portion contains non-public and highly sensitive information  |
|          |  |  | including, but not limited to investment decisions and revenue   |
|          |  |  | figures and projections, which could<br>be used to injure Microsoft if made<br>publicly available.   |
| PX1425   | FTC's Exhibit                            | Redacted Version   | This portion contains non-public and   |
|          | List                                     | Forthcoming  | highly sensitive information including, but not limited to revenue figures and projections, which could  |
|          |  |  | be used to injure Microsoft if made publicly available.  |
|          | 1  | 1  | 1  |

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CASE No. 3:23-cv-02880-JSC

| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i>   | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|----------|--|---|--|
|          |  | Treatment   |  |
| PX4892   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming   | This portion contains non-public and highly sensitive information including, but not limited to revenue  |
|          |  |   | figures and projections, which could be used to injure Microsoft if made publicly available.   |
| DY1950   | FTC's Exhibit                            | Document  | This portion contains non-public and   |
| 1 X1039  | List                                     | Withheld  | highly sensitive information including, but not limited to strategic   |
|          |  |   | evaluation of forward-looking<br>opportunities and revenue figures and<br>projections, which could be used to  |
|          |  |   | injure Microsoft if made publicly available.   |
| PX1025   | FTC's Exhibit                            | Redacted Version  | This portion contains non-public and highly sensitive information  |
|          | Elst                                     | Toruncoming   | including, but not limited to revenue figures and projections, which could   |
|          |  |   | be used to injure Microsoft if made publicly available.  |
| PX1052   | FTC's Exhibit<br>List                    | Document<br>Withheld  | This portion contains non-public and highly sensitive information  |
|          |  |   | including, but not limited to internal decision-making processes, which  |
|          |  |   | could be used to injure Microsoft if made publicly available.  |
| PX1419   | FTC's Exhibit<br>List                    | Document<br>Withheld  | This portion contains non-public and highly sensitive information  |
|          |  |   | including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made   |
|          |  |   | publicly available.  |
| PX4057   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming   | This portion contains non-public and highly sensitive information  |
|          |  |   | including, but not limited to revenue figures and projections, which could   |
|          |  |   | be used to injure Microsoft if made publicly available.  |
|          | PX1859  PX1025  PX107                    | PX4892 FTC's Exhibit List  PX1859 FTC's Exhibit List  PX1025 FTC's Exhibit List  PX1052 FTC's Exhibit List  PX1419 FTC's Exhibit List | PX4892  FTC's Exhibit List  PX1859  FTC's Exhibit List  PX1025  FTC's Exhibit List  PX1025  FTC's Exhibit List  PX1052  FTC's Exhibit List  PX1052  FTC's Exhibit List  Document Withheld  PX1054  PX1055  FTC's Exhibit List  Document Withheld  PX1056  PX1057  FTC's Exhibit List  Redacted Version Forthcoming  Reducted Version Forthcoming  Reducted Version Forthcoming  Reducted Version Forthcoming |

| 1 2 | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i> | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>                |
|-----|----------|--|---|--|
| 3   |          |  | Treatment   |  |
| 4   | PX1995   | FTC's Exhibit<br>List                    | Document<br>Withheld                                    | This portion contains non-public and highly sensitive information        |
| 5   |          | List                                     | Withheld  | including, but not limited to  |
| 6   |          |  |   | investment decisions and terms of existing confidential agreements,      |
| 7   |          |  |   | which could be used to injure Microsoft if made publicly available.      |
| 8   | PX1517   | FTC's Exhibit                            | Redacted Version  | This portion contains non-public and                                     |
| 9   |          | List                                     | Forthcoming   | highly sensitive information including, but not limited to internal      |
| 10  |          |  |   | presentations discussing business  |
| 11  |          |  |   | strategy, which could be used to injure Microsoft if made publicly       |
| 12  |          |  |   | available.   |
| 13  | PX1890   | FTC's Exhibit<br>List                    | Document<br>Withheld                                    | This portion contains non-public and highly sensitive information        |
| 14  |          | Dist                                     | , vilimera  | including, but not limited to revenue                                    |
| 15  |          |  |   | figures and projections, which could be used to injure Microsoft if made |
| 16  |          |  |   | publicly available.  |
| 17  | PX1741   | FTC's Exhibit<br>List                    | Document<br>Withheld                                    | This portion contains non-public and highly sensitive information        |
| 18  |          |  |   | including, but not limited to internal presentations discussing business |
| 19  |          |  |   | strategy, which could be used to   |
| 20  |          |  |   | injure Microsoft if made publicly available.                             |
| 21  | PX4336   | FTC's Exhibit                            | Redacted Version  | This portion contains non-public and                                     |
| 22  |          | List                                     | Forthcoming   | highly sensitive information including, but not limited to revenue       |
| 23  |          |  |   | figures and projections and strategic                                    |
| 24  |          |  |   | evaluation of forward-looking opportunities, which could be used to      |
| 25  |          |  |   | injure Microsoft if made publicly available.                             |
| 26  |          |  |   |  |
| 27  |          |  |   |  |

|                                 |          |  |   | I   |
|---------------------------------|----------|--|---|---|
| 1<br>2<br>3                     | Document | Party Seeking<br>to Introduce<br>Exhibit | Information Requested for In Camera Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>                     |
| 4                               | PX1855   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming               | This portion contains non-public and highly sensitive information             |
| 5                               |          |  |   | including, but not limited to internal presentations discussing business      |
| 6<br>7                          |          |  |   | strategy, which could be used to injure Microsoft if made publicly available. |
| 8                               | PX1651   | FTC's Exhibit                            | Document                                      | This portion contains non-public and  |
| 9                               |          | List                                     | Withheld                                      | highly sensitive information including, but not limited to revenue            |
| 10                              |          |  |   | figures and projections, market share analyses, and assessment of the         |
| 11                              |          |  |   | competitive landscape, which could  |
| 12                              |          |  |   | be used to injure Microsoft if made publicly available.                       |
| 13                              | PX1240   | FTC's Exhibit                            | Document                                      | This portion contains non-public and  |
| 14                              |          | List                                     | Withheld                                      | highly sensitive information including, but not limited to internal           |
| 15                              |          |  |   | presentations discussing business<br>strategy and revenue figures and         |
| <ul><li>16</li><li>17</li></ul> |          |  |   | projections, which could be used to injure Microsoft if made publicly         |
| 18                              |          |  |   | available.  |
| 19                              | PX1022   | FTC's Exhibit<br>List                    | Document<br>Withheld                          | This portion contains non-public and highly sensitive information             |
| 20                              |          |  |   | including, but not limited to revenue figures and projections and internal    |
| 21                              |          |  |   | decision-making processes which could be used to injure Microsoft if          |
| 22                              |          |  |   | made publicly available.  |
| 23                              | PX4895   | FTC's Exhibit                            | Redacted Version                              | This portion contains non-public and  |
| 24                              |          | List                                     | Forthcoming                                   | highly sensitive information including, but not limited to internal           |
| 25                              |          |  |   | decision-making processes, which could be used to injure Microsoft if         |
| 26                              |          |  |   | made publicly available.  |
| 27                              |          |  |   |   |

| 1 2      | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for In<br>Camera | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|----------|----------|--|---|--|
| 3        |          |  | Treatment                                 |  |
| 4<br>5   | PX1785   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming           | This portion contains non-public and highly sensitive information including, but not limited to strategic                                  |
| 6<br>7   |          |  |   | evaluation of forward-looking<br>opportunities, revenue figures,<br>projections, and investment decisions<br>which could be used to injure |
| 8        |          |  |   | Microsoft if made publicly available.  |
| 9        | PX4341   | FTC's Exhibit<br>List                    | Document<br>Withheld                      | This portion contains non-public and highly sensitive information  |
| 10       |          |  |   | including, but not limited to revenue figures and projections, which could   |
| 11       |          |  |   | be used to injure Microsoft if made publicly available.  |
| 12       |          |  |   | 1 ,  |
| 13<br>14 | PX1563   | FTC's Exhibit<br>List                    | Document<br>Withheld                      | This portion contains non-public and highly sensitive information including, but not limited to  |
| 15       |          |  |   | assessment of the competitive landscape and revenue figures and  |
| 16       |          |  |   | projections, which could be used to injure Microsoft if made publicly  |
| 17       |          |  |   | available.   |
| 18       | PX1114   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming           | This portion contains non-public and highly sensitive information  |
| 19       |          |  |   | including, but not limited to internal presentations discussing business   |
| 20       |          |  |   | strategy, which could be used to injure Microsoft if made publicly   |
| 21   22  |          |  |   | available.   |
| 23       | PX1888   | FTC's Exhibit                            | Document                                  | This portion contains non-public and   |
| 24       |          | List                                     | Withheld                                  | highly sensitive information including, but not limited to revenue   |
| 25       |          |  |   | figures and projections, market share analyses, and internal presentations   |
| 26       |          |  |   | discussing business strategy, which could be used to injure Microsoft if   |
| 27       |          |  |   | made publicly available.   |
| -,       |          |  |   | 1  |

| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|----------|--|--|--|
| PX1752   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to assessment of the competitive landscape and market share analyses, which could be used to injure Microsoft if made publicly available. |
| PX1746   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information  |
|          |  |  | including, but not limited to strategic evaluation of forward-looking  |
|          |  |  | opportunities and internal presentations discussing business   |
|          |  |  | strategy, which could be used to injure Microsoft if made publicly available.  |
| PX1750   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to strategic  |
|          |  |  | evaluation of forward-looking<br>opportunities and internal<br>presentations discussing business<br>strategy, which could be used to   |
|          |  |  | injure Microsoft if made publicly available.   |
| PX1747   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information  |
|          |  |  | including, but not limited to revenue figures and projections, which could   |
|          |  |  | be used to injure Microsoft if made publicly available.  |
| PX1751   | FTC's Exhibit                            | Document   | This portion contains non-public and   |
|          | List                                     | Withheld   | highly sensitive information including, but not limited to strategic   |
|          |  |  | evaluation of forward-looking opportunities, which could be used to  |
|          |  |  | injure Microsoft if made publicly available.   |
|          |  |  |  |

| 1 2 | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br>Camera | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>                  |
|-----|----------|--|--|--|
| 3   |          |  | Treatment  |  |
| 4   | PX1904   | FTC's Exhibit<br>List                    | Document<br>Withheld                             | This portion contains non-public and highly sensitive information          |
| 5   |          |  |  | including, but not limited to assessment of the competitive                |
| 6   |          |  |  | landscape and market share analyses,                                       |
| 7   |          |  |  | which could be used to injure Microsoft if made publicly available.        |
| 8   | PX1905   | FTC's Exhibit                            | Document   | This portion contains non-public and                                       |
| 9   |          | List                                     | Withheld   | highly sensitive information including, but not limited to                 |
| 10  |          |  |  | assessment of the competitive  |
| 11  |          |  |  | landscape and market share analyses, which could be used to injure         |
| 12  |          |  |  | Microsoft if made publicly available.                                      |
| 13  | PX1854   | FTC's Exhibit<br>List                    | Document<br>Withheld                             | This portion contains non-public and highly sensitive information          |
| 14  |          |  |  | including, but not limited to revenue figures and projections, which could |
| 15  |          |  |  | be used to injure Microsoft if made  |
| 16  |          |  |  | publicly available.  |
| 17  | PX4631   | FTC's Exhibit<br>List                    | Document<br>Withheld                             | This portion contains non-public and highly sensitive information          |
| 18  |          |  |  | including, but not limited to revenue figures and projections, which could |
| 19  |          |  |  | be used to injure Microsoft if made  |
| 20  |          |  |  | publicly available.  |
| 21  | PX4181   | FTC's Exhibit<br>List                    | Redacted Version Forthcoming                     | This portion contains non-public and highly sensitive information          |
| 22  |          |  |  | including, but not limited to strategic evaluation of forward-looking      |
| 23  |          |  |  | opportunities and internal   |
| 24  |          |  |  | presentations discussing business strategy, which could be used to         |
| 25  |          |  |  | injure Microsoft if made publicly available.                               |
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| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|--|--|---|
| PX4154   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.                    |
| PX1893   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made publicly available.  |
| PX1887   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to Internal decision-making processes which could be used to injure Microsoft if made publicly available.                                      |
| PX1881   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to internal decision-making processes and revenue figures and projections, which could be used to injure Microsoft if made publicly available. |
| PX1896   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.                  |

| 1<br>2<br>3 | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|-------------|----------|--|--|---|
| 4           | PX4437   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information   |
| 5           |          | List                                     | Torthcoming  | including, but not limited to revenue figures and projections, which could                                |
| 6           |          |  |  | be used to injure Microsoft if made publicly available.   |
| 7<br>8      | PX4792   | FTC's Exhibit                            | Document   | This portion contains non-public and  |
| 9           |          | List                                     | Withheld   | highly sensitive information including, but not limited to terms of existing confidential agreements,     |
| 10          |          |  |  | which could be used to injure Microsoft if made publicly available.                                       |
| 11          |          |  |  | 1   |
| 12          | PX4793   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information   |
| 13          |          |  |  | including, but not limited to terms of existing confidential agreements,                                  |
| 14          |          |  |  | which could be used to injure Microsoft if made publicly available.                                       |
| 15          | PX1777   | FTC's Exhibit                            | Dannant  |   |
| 16<br>17    | PAI///   | List                                     | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to strategic |
| 18          |          |  |  | evaluation of forward-looking opportunities, which could be used to                                       |
| 19          |          |  |  | injure Microsoft if made publicly available.  |
| 20          | PX1865   | FTC's Exhibit                            | Document   | This portion contains non-public and  |
| 21          |          | List                                     | Withheld   | highly sensitive information including, but not limited to revenue  |
| 22          |          |  |  | figures and projections and assessment of the competitive   |
| 23<br>24    |          |  |  | landscape, which could be used to injure Microsoft if made publicly                                       |
|             |          |  |  | available.  |
| 25          |          |  |  |   |
| 26          |          |  |  |   |
| 27          |          |  |  |   |

| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for In Camera Treatment<br>Request <sup>1</sup>  |
|----------|--|--|--|
| PX1889   | FTC's Exhibit<br>List                    | Redacted Version   | This portion contains non-public and   |
|          | List                                     | Forthcoming  | highly sensitive information including, but not limited to strategic evaluation of forward-looking |
|          |  |  | opportunities, which could be used to injure Microsoft if made publicly available.                 |
| PX4578   | FTC's Exhibit                            | Redacted Version   | This portion contains non-public and   |
| 1745/0   | List                                     | Forthcoming  | highly sensitive information   |
|          |  |  | including, but not limited to terms o existing confidential agreements,                            |
|          |  |  | which could be used to injure Microsoft if made publicly available                                 |
| PX4182   | FTC's Exhibit                            | Document   | This portion contains non-public and   |
| 1111102  | List                                     | Withheld   | highly sensitive information including, but not limited to strategi                                |
|          |  |  | evaluation of forward-looking opportunities, which could be used                                   |
|          |  |  | injure Microsoft if made publicly available.   |
| PX4588   | FTC's Exhibit                            | Document   | This portion contains non-public an  |
|          | List                                     | Withheld   | highly sensitive information including, but not limited to terms of                                |
|          |  |  | existing confidential agreements, which could be used to injure                                    |
|          |  |  | Microsoft if made publicly available   |
| PX0006   | FTC's Exhibit                            | Document<br>Widely and   | This portion contains non-public an  |
|          | List                                     | Withheld   | highly sensitive information including, but not limited to revenu                                  |
|          |  |  | figures and projections and assessment of the competitive  |
|          |  |  | landscape, which could be used to injure Microsoft if made publicly                                |
|          |  |  | available.   |
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| 1 2 | Document | Party Seeking<br>to Introduce<br>Exhibit | Information Requested for <i>In</i> Camera Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>                  |
|-----|----------|--|--|--|
| 3   | PX4897   | FTC's Exhibit                            | Document   | This portion contains non-public and                                       |
| 4   | 1 740)   | List                                     | Withheld   | highly sensitive information   |
| 5   |          |  |  | including, but not limited to strategic evaluation of forward-looking      |
| 6   |          |  |  | opportunities, which could be used to injure Microsoft if made publicly    |
| 7   |          |  |  | available.   |
| 8   | PX4671   | FTC's Exhibit                            | Document   | This portion contains non-public and                                       |
| 9   |          | List                                     | Withheld   | highly sensitive information including, but not limited to strategic       |
| 10  |          |  |  | evaluation of forward-looking opportunities, which could be used to        |
| 11  |          |  |  | injure Microsoft if made publicly available.                               |
| 12  |          |  | _  |  |
| 13  | PX4672   | FTC's Exhibit<br>List                    | Document Withheld                                    | This portion contains non-public and highly sensitive information          |
| 14  |          |  |  | including, but not limited to revenue figures and projections, which could |
| 15  |          |  |  | be used to injure Microsoft if made publicly available.                    |
| 16  |          |  | - 1 177  | 1  |
| 17  | PX4893   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                      | This portion contains non-public and highly sensitive information          |
| 18  |          |  | -  | including, but not limited to internal presentations discussing business   |
| 19  |          |  |  | strategy and assessment of the   |
| 20  |          |  |  | competitive landscape, which could be used to injure Microsoft if made     |
| 21  |          |  |  | publicly available.  |
| 22  | PX4673   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                      | This portion contains non-public and highly sensitive information          |
| 23  |          | List                                     | Tormcoming   | including, but not limited to revenue                                      |
| 24  |          |  |  | figures and projections and internal presentations discussing business     |
| 25  |          |  |  | strategy, which could be used to injure Microsoft if made publicly         |
| 26  |          |  |  | available.   |
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| 1<br>2<br>3                      | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------------------------------|----------|--|--|---|
| 4<br>5<br>6<br>7                 | PX4894   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.    |
| 8<br>9<br>10<br>11<br>12         | PX4896   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.    |
| 13<br>14<br>15<br>16             | PX4684   | FTC's Exhibit<br>List                    | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.    |
| 17<br>18<br>19<br>20<br>21<br>22 | PX1182   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and investment decisions, which could be used to injure Microsoft if made publicly available. |
| 23<br>24<br>25<br>26<br>27       | PX4354   | FTC's Exhibit<br>List                    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.    |

| 1 2      | Document | Party Seeking<br>to Introduce<br>Exhibit | Information Requested for <i>In</i> Camera Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
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| 3        |          |  |  |   |
| 4<br>5   | PX4260   | FTC's Exhibit<br>List                    | Document<br>Withheld                                 | This portion contains non-public and highly sensitive information including, but not limited to revenue   |
| 6<br>7   |          |  |  | figures and projections and internal decision-making processes which could be used to injure Microsoft if |
|          |          |  |  | made publicly available.  |
| 8        | PX4267   | FTC's Exhibit<br>List                    | Document<br>Withheld                                 | This portion contains non-public and highly sensitive information   |
| 9        |          | List                                     | Withheld   | including, but not limited to strategic   |
| 10       |          |  |  | evaluation of forward-looking opportunities, which could be used to                                       |
| 11       |          |  |  | injure Microsoft if made publicly available.  |
| 12       | PX4670   | FTC's Exhibit                            | Document   | This portion contains non-public and  |
| 13       |          | List                                     | Withheld   | highly sensitive information including, but not limited to revenue  |
| 14       |          |  |  | figures and projections and assessment of competitive landscape,  |
| 15       |          |  |  | which could be used to injure Microsoft if made publicly available.                                       |
| 16       | PX4157   | FTC's Exhibit                            | Redacted Version                                     | This portion contains non-public and  |
| 17<br>18 |          | List                                     | Forthcoming  | highly sensitive information including, but not limited to strategic evaluation of forward-looking        |
| 19       |          |  |  | opportunities, which could be used to injure Microsoft if made publicly available.                        |
| 20       | PX1767   | FTC's Exhibit                            | Document   | This portion contains non-public and  |
| 21       |          | List                                     | Withheld   | highly sensitive information including, but not limited to strategic                                      |
| 22       |          |  |  | evaluation of forward-looking   |
| 23       |          |  |  | opportunities, which could be used to injure Microsoft if made publicly available.                        |
| 24       | PX1529   | FTC's Exhibit                            | Redacted Version                                     | This portion contains non-public and  |
| 25       | 171327   | List                                     | Forthcoming  | highly sensitive information including, but not limited to  |
| 26       |          |  |  | investment decision, which could be   |
| 27       |          |  |  | used to injure Microsoft if made publicly available.  |
| 28       |          |  | 1  |   |

| 1        | Document | Party Seeking to Introduce | Information<br>Requested for <i>In</i> |
|----------|----------|----------------------------|--|
| 2 3      |          | Exhibit                    | Camera<br>Treatment                    |
| 4        | PX4676   | FTC's Exhibit<br>List      | Redacted Version<br>Forthcoming        |
| 5        |          |                            |  |
| 6        |          |                            |  |
| 7        | PX1188   | FTC's Exhibit<br>List      | Document<br>Withheld                   |
| 8        |          | List                       | Withheld                               |
| 9   10   |          |                            |  |
| 11       | PX1015   | FTC's Exhibit              | Document                               |
| 12       |          | List                       | Withheld                               |
| 13       |          |                            |  |
| 14       | PX1019   | FTC's Exhibit              | Document                               |
| 15       |          | List                       | Withheld                               |
| 16       |          |                            |  |
| 17       | PX4625   | FTC's Exhibit              | Document                               |
| 18       | 1 X4023  | List                       | Withheld                               |
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| 22       | PX1828   | FTC's Exhibit<br>List      | Redacted Version<br>Forthcoming        |
| 23       |          |                            |  |
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Basis for In Camera Treatment

This portion contains non-public and

including, but not limited to revenue figures and projections, which could be used to injure Microsoft if made

This portion contains non-public and

including, but not limited to internal decision-making process, which could be used to injure Microsoft if made

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including, but not limited to business partnerships, which could be used to injure Microsoft if made publicly

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including, but not limited to strategic

opportunities, which could be used to injure Microsoft if made publicly

highly sensitive information

evaluation of forward-looking

publicly available.

publicly available.

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available.

available.

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Request<sup>1</sup>

| 1 2 | Document         | Party Seeking<br>to Introduce<br>Exhibit | Information Requested for <i>In</i> Camera Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|-----|------------------|--|--|--|
| 3   | PX4652           | FTC's Exhibit                            | Redacted Version                                     | This portion contains non-public and   |
| 4   | 1111002          | List                                     | Forthcoming  | highly sensitive information including, but not limited to, strategic                                    |
| 5   |                  |  |  | evaluation of forward-looking opportunities and internal decision-                                       |
| 6   |                  |  |  | making processes, which could be used to injure Microsoft if made  |
| 7   |                  |  |  | publicly available.  |
| 8 9 | PX4624           | FTC's Exhibit<br>List                    | Document<br>Withheld                                 | This portion contains non-public and highly sensitive information including, but not limited to terms of |
| 10  |                  |  |  | existing confidential agreements, which could be used to injure  |
| 11  |                  |  |  | Microsoft if made publicly available.  |
| 12  | PX4721           | FTC's Exhibit<br>List                    | Document<br>Withheld                                 | This portion contains non-public and highly sensitive information  |
| 13  |                  |  |  | including, but not limited to internal decision-making processes, which                                  |
| 14  |                  |  |  | could be used to injure Microsoft if made publicly available.  |
| 15  | PX7002 (Choudhry | FTC's Exhibit                            | Transcript   | This investigative hearing transcript  |
| 16  | IH Tr.)          | List                                     | Withheld   | contains non-public and highly sensitive information, including, but                                     |
| 17  |                  |  |  | not limited to, internal decision-<br>making processes, investment                                       |
| 18  |                  |  |  | decisions, strategic evaluation of forward-looking opportunities, market                                 |
| 19  |                  |  |  | share analyses, assessment of the competitive landscape, and internal                                    |
| 20  |                  |  |  | discussions of business strategy,<br>which could be used to injure                                       |
| 21  |                  |  |  | Microsoft if made publicly available.  Microsoft proposes the parties meet                               |
| 22  |                  |  |  | and confer regarding the specific portions of the transcript are intended                                |
| 23  |                  |  |  | to be used.  |
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| 1<br>2<br>3 | Document                | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|-------------|-------------------------|--|--|---|
| 4           | PX7003 (Bond IH Tr.)    | FTC's Exhibit<br>List                    | Transcript<br>Withheld   | This investigative hearing transcript contains non-public and highly  |
| 5           | ,                       |  |  | sensitive information, including, but not limited to, internal decision-                                    |
| 6           |                         |  |  | making processes, investment decisions, strategic evaluation of   |
| 7           |                         |  |  | forward-looking opportunities, market share analyses, assessment of the                                     |
| 8           |                         |  |  | competitive landscape, and internal discussions of business strategy, which could be used to injure         |
| 9           |                         |  |  | Microsoft if made publicly available. Microsoft proposes the parties meet                                   |
| 10          |                         |  |  | and confer regarding the specific portions of the transcript are intended                                   |
| 12          |                         |  |  | to be used.   |
| 13          | PX7005 (West IH<br>Tr.) | FTC's Exhibit<br>List                    | Transcript<br>Withheld   | This investigative hearing transcript contains non-public and highly  |
| 14          |                         |  |  | sensitive information, including, but<br>not limited to, internal decision-<br>making processes, investment |
| 15          |                         |  |  | decisions, strategic evaluation of forward-looking opportunities, market                                    |
| 16          |                         |  |  | share analyses, assessment of the competitive landscape, and internal                                       |
| 17          |                         |  |  | discussions of business strategy, which could be used to injure   |
| 18          |                         |  |  | Microsoft if made publicly available. Microsoft proposes the parties meet and confer regarding the specific |
| 19          |                         |  |  | portions of the transcript are intended to be used.   |
| 20          |                         |  |  | to be used.   |
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| Document                  | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|---------------------------|--|--|--|
| PX7007 (Stuart II<br>Tr.) | H FTC's Exhibit List                     | Transcript<br>Withheld   | This investigative hearing transcript contains non-public and highly sensitive information, including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, and internal discussions of business strategy, which could be used to injure Microsoft if made publicly available. Microsoft proposes the parties meet and confer regarding the specific portions of the transcript are intended to be used. |
| PX7009 (Smith II          | H FTC's Exhibit List                     | Transcript<br>Withheld   | This investigative hearing transcript contains non-public and highly sensitive information, including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, and internal discussions of business strategy, which could be used to injure Microsoft if made publicly available. Microsoft proposes the parties meet and confer regarding the specific portions of the transcript are intended to be used. |
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| 1 2 3 | Document        | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>                 |
|-------|-----------------|--|--|---|
|       | PX7010 (Nadella | FTC's Exhibit                            | Transcript   | This investigative hearing transcript                                     |
| 4     | IH Tr.)         | List                                     | Withheld   | contains non-public and highly sensitive information, including, but      |
| 5     |                 |  |  | not limited to, internal decision-<br>making processes, investment        |
| 6     |                 |  |  | decisions, strategic evaluation of forward-looking opportunities, market  |
| 7     |                 |  |  | share analyses, assessment of the competitive landscape, and internal     |
| 8     |                 |  |  | discussions of business strategy,<br>which could be used to injure        |
| 9     |                 |  |  | Microsoft if made publicly available. Microsoft proposes the parties meet |
| 10    |                 |  |  | and confer regarding the specific portions of the transcript are intended |
| 11    |                 |  |  | to be used.   |
| 12    | PX7011 (Spencer | FTC's Exhibit<br>List                    | Transcript<br>Withheld   | This investigative hearing transcript                                     |
| 13    | IH Tr. Vol I)   | List                                     | withheid   | contains non-public and highly sensitive information, including, but      |
| 14    |                 |  |  | not limited to, internal decision-<br>making processes, investment        |
| 15    |                 |  |  | decisions, strategic evaluation of forward-looking opportunities, market  |
| 16    |                 |  |  | share analyses, assessment of the competitive landscape, and internal     |
| 17    |                 |  |  | discussions of business strategy, which could be used to injure           |
| 18    |                 |  |  | Microsoft if made publicly available. Microsoft proposes the parties meet |
| 19    |                 |  |  | and confer regarding the specific portions of the transcript are intended |
| 20    |                 |  |  | to be used.   |
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| 1<br>2<br>3 | Document                        | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|-------------|---------------------------------|--|--|---|
| 4           | PX7012 (Spencer IH Tr. Vol. II) | FTC's Exhibit<br>List                    | Transcript<br>Withheld   | This investigative hearing transcript contains non-public and highly  |
| 5           |                                 | Zist                                     | , , , , , , , , , , , , , , , , , , ,                                | sensitive information, including, but not limited to, internal decision-                                    |
| 6           |                                 |  |  | making processes, investment decisions, strategic evaluation of   |
| 7           |                                 |  |  | forward-looking opportunities, market share analyses, assessment of the                                     |
| 8           |                                 |  |  | competitive landscape, and internal discussions of business strategy, which could be used to injure         |
| 9           |                                 |  |  | Microsoft if made publicly available. Microsoft proposes the parties meet                                   |
| 10          |                                 |  |  | and confer regarding the specific portions of the transcript are intended                                   |
| 12          |                                 |  |  | to be used.   |
| 13          | PX7014 (Booty IH<br>Tr.)        | FTC's Exhibit<br>List                    | Transcript Withheld  | This investigative hearing transcript contains non-public and highly  |
| 14          |                                 |  |  | sensitive information, including, but<br>not limited to, internal decision-<br>making processes, investment |
| 15          |                                 |  |  | decisions, strategic evaluation of forward-looking opportunities, market                                    |
| 16          |                                 |  |  | share analyses, assessment of the competitive landscape, and internal                                       |
| 17          |                                 |  |  | discussions of business strategy, which could be used to injure   |
| 18          |                                 |  |  | Microsoft if made publicly available.  Microsoft proposes the parties meet                                  |
| 19          |                                 |  |  | and confer regarding the specific portions of the transcript are intended to be used.                       |
| 20          |                                 |  |  | to be used.   |
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| 1 2 | Document                  | Party Seeking<br>to Introduce<br>Exhibit | Information Requested for <i>In</i> Camera Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|-----|---------------------------|--|--|---|
| 3   | PX7025 (Smith             | FTC's Exhibit                            |  | This deposition transcript contains   |
| 4   | Dep. Tr.)                 | List                                     | Transcript Withheld                                  | non-public and highly sensitive   |
| 5   |                           |  |  | information, including, but not limited to, internal decision-making                                    |
| 6   |                           |  |  | processes, investment decisions, strategic evaluation of forward-                                       |
| 7   |                           |  |  | looking opportunities, market share analyses, assessment of the   |
| 8   |                           |  |  | competitive landscape, and internal discussions of business strategy,                                   |
| 9   |                           |  |  | which could be used to injure Microsoft if made publicly available. Microsoft proposes the parties meet |
| 10  |                           |  |  | and confer regarding the specific portions of the transcript are intended                               |
| 11  |                           |  |  | to be used.   |
| 12  | PX7026 (Hampton Dep. Tr.) | FTC's Exhibit<br>List                    | Transcript Withheld                                  | This deposition transcript contains non-public and highly sensitive                                     |
| 13  | 2 <b>c</b> p. 11.)        | 2160                                     | · · · · · · · · · · · · · · · · · · ·                | information, including, but not limited to, internal decision-making                                    |
| 14  |                           |  |  | processes, investment decisions,<br>strategic evaluation of forward-                                    |
| 15  |                           |  |  | looking opportunities, market share analyses, assessment of the   |
| 16  |                           |  |  | competitive landscape, and internal discussions of business strategy,                                   |
| 17  |                           |  |  | which could be used to injure Microsoft if made publicly available.                                     |
| 18  |                           |  |  | Microsoft proposes the parties meet and confer regarding the specific                                   |
| 19  |                           |  |  | portions of the transcript are intended to be used.   |
| 20  |                           |  |  | to be used.   |
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| 1 2      | Document                        | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i> | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|---------------------------------|--|---|---|
| 3        |                                 |  | Treatment   |   |
| 4        | PX7027 (Hampton Corp. Rep. Dep. | FTC's Exhibit<br>List                    | Transcript<br>Withheld                                  | This deposition transcript contains non-public and highly sensitive   |
| 5        | Tr.)                            |  |   | information, including, but not limited to, internal decision-making processes, investment decisions,       |
| 6        |                                 |  |   | strategic evaluation of forward-<br>looking opportunities, market share                                     |
| 7        |                                 |  |   | analyses, assessment of the competitive landscape, and internal   |
| 8 9      |                                 |  |   | discussions of business strategy, which could be used to injure   |
| 10       |                                 |  |   | Microsoft if made publicly available. Microsoft proposes the parties meet and confer regarding the specific |
| 11       |                                 |  |   | portions of the transcript are intended to be used.   |
| 12       | PX7028 (Spencer                 | FTC's Exhibit                            | Transcript  | This deposition transcript contains   |
| 13       | Dep. Tr.)                       | List                                     | Withheld  | non-public and highly sensitive information, including, but not limited                                     |
| 14       |                                 |  |   | to, internal decision-making processes, investment decisions,   |
| 15       |                                 |  |   | strategic evaluation of forward-<br>looking opportunities, market share<br>analyses, assessment of the      |
| 16       |                                 |  |   | competitive landscape, and internal discussions of business strategy,                                       |
| 17<br>18 |                                 |  |   | which could be used to injure Microsoft if made publicly available.   |
| 19       |                                 |  |   | Microsoft proposes the parties meet<br>and confer regarding the specific                                    |
| 20       |                                 |  |   | portions of the transcript are intended to be used.   |
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| Document                       | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|--------------------------------|--|--|---|
| PX7029 (Percy<br>Dep. Tr.)     | FTC's Exhibit<br>List                    | Transcript<br>Withheld   | This deposition transcript contains non-public and highly sensitive information, including, but not limited to, internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share |
|                                |  |  | analyses, assessment of the competitive landscape, and internal discussions of business strategy,   |
|                                |  |  | which could be used to injure Microsoft if made publicly available.   |
|                                |  |  | Microsoft proposes the parties meet<br>and confer regarding the specific<br>portions of the transcript are intended   |
|                                |  |  | to be used.   |
| PX7031 (Greenberg<br>Dep. Tr.) | g FTC's Exhibit<br>List                  | Transcript<br>Withheld   | This deposition transcript contains<br>non-public and highly sensitive<br>information, including, but not limited   |
|                                |  |  | to, internal decision-making processes, investment decisions, strategic evaluation of forward-  |
|                                |  |  | looking opportunities, market share<br>analyses, assessment of the<br>competitive landscape, and internal   |
|                                |  |  | discussions of business strategy, which could be used to injure   |
|                                |  |  | Microsoft if made publicly available.<br>Microsoft proposes the parties meet<br>and confer regarding the specific   |
|                                |  |  | portions of the transcript are intended to be used.   |
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| 1<br>2<br>3 | Document                  | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|-------------|---------------------------|--|--|---|
| 4           | PX7032 (Hood<br>Dep. Tr.) | FTC's Exhibit<br>List                    | Transcript<br>Withheld   | This deposition transcript contains non-public and highly sensitive   |
| 5           |                           |  |  | information, including, but not limited to, internal decision-making  |
| 6           |                           |  |  | processes, investment decisions, strategic evaluation of forward-   |
| 7           |                           |  |  | looking opportunities, market share<br>analyses, assessment of the<br>competitive landscape, and internal   |
| 8           |                           |  |  | discussions of business strategy,<br>which could be used to injure  |
| 9           |                           |  |  | Microsoft if made publicly available. Microsoft proposes the parties meet                                   |
| 11          |                           |  |  | and confer regarding the specific portions of the transcript are intended                                   |
| 12          | PX7034 (Gluckstein        | FTC's Exhibit                            | Transcript   | to be used.   |
| 13          | Dep. Tr.)                 | List                                     | Withheld   | This deposition transcript contains non-public and highly sensitive information, including, but not limited |
| 14          |                           |  |  | to, internal decision-making processes, investment decisions,   |
| 15          |                           |  |  | strategic evaluation of forward-<br>looking opportunities, market share                                     |
| 16          |                           |  |  | analyses, assessment of the competitive landscape, and internal   |
| 17          |                           |  |  | discussions of business strategy,<br>which could be used to injure<br>Microsoft if made publicly available. |
| 18          |                           |  |  | Microsoft proposes the parties meet<br>and confer regarding the specific                                    |
| 19<br>20    |                           |  |  | portions of the transcript are intended to be used.   |
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| 1 2      | Document                     | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i> | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|----------|------------------------------|--|---|--|
| 3        |                              |  | Treatment   |  |
| 4        | PX7036 (Nadella<br>Dep. Tr.) | FTC's Exhibit<br>List                    | Transcript Withheld                                     | This deposition transcript contains non-public and highly sensitive                                  |
| 5        |                              |  |   | information, including, but not limited to, internal decision-making                                 |
| 6        |                              |  |   | processes, investment decisions, strategic evaluation of forward-                                    |
| 7        |                              |  |   | looking opportunities, market share analyses, assessment of the                                      |
| 8        |                              |  |   | competitive landscape, and internal discussions of business strategy,                                |
| 9        |                              |  |   | which could be used to injure Microsoft if made publicly available.                                  |
| 10       |                              |  |   | Microsoft proposes the parties meet and confer regarding the specific                                |
| 11       |                              |  |   | portions of the transcript are intended to be used.  |
| 12       | PX7037 (Ronald               | FTC's Exhibit                            | Transcript Withheld                                     | This deposition transcript contains  |
| 13       | Dep. Tr.)                    | List                                     | withheid  | non-public and highly sensitive information, including, but not limited to, internal decision-making |
| 14       |                              |  |   | processes, investment decisions,<br>strategic evaluation of forward-                                 |
| 15       |                              |  |   | looking opportunities, market share analyses, assessment of the                                      |
| 16<br>17 |                              |  |   | competitive landscape, and internal discussions of business strategy,                                |
| 18       |                              |  |   | which could be used to injure Microsoft if made publicly available.                                  |
| 19       |                              |  |   | Microsoft proposes the parties meet and confer regarding the specific                                |
| 20       |                              |  |   | portions of the transcript are intended to be used.  |
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| 1        | Document                    | Party Seeking           | Information                       | Basis for In Camera Treatment   |
|----------|-----------------------------|-------------------------|-----------------------------------|---|
| 2 3      |                             | to Introduce<br>Exhibit | Requested for In Camera Treatment | Request <sup>1</sup>  |
| 4        | PX7040 (Stuart<br>Dep. Tr.) | FTC's Exhibit<br>List   | Transcript<br>Withheld            | This deposition transcript contains non-public and highly sensitive   |
| 5        |                             |                         |                                   | information, including, but not limited to, internal decision-making processes, investment decisions,               |
| 6        |                             |                         |                                   | strategic evaluation of forward-looking opportunities, market share   |
| 7 8      |                             |                         |                                   | analyses, assessment of the competitive landscape, and internal   |
| 9        |                             |                         |                                   | discussions of business strategy, which could be used to injure   |
| 10       |                             |                         |                                   | Microsoft if made publicly available. Microsoft proposes the parties meet and confer regarding the specific         |
| 11       |                             |                         |                                   | portions of the transcript are intended to be used.   |
| 12       | PX7041 (Stuart              | FTC's Exhibit           | Transcript                        | This deposition transcript contains   |
| 13       | Corp. Rep. Dep.<br>Tr.)     | List                    | Withheld                          | non-public and highly sensitive information, including, but not limited to, internal decision-making                |
| 14<br>15 |                             |                         |                                   | processes, investment decisions,<br>strategic evaluation of forward-  |
| 16       |                             |                         |                                   | looking opportunities, market share analyses, assessment of the   |
| 17       |                             |                         |                                   | competitive landscape, and internal discussions of business strategy, which could be used to injure                 |
| 18       |                             |                         |                                   | Microsoft if made publicly available.   |
| 19       |                             |                         |                                   | Microsoft proposes the parties meet<br>and confer regarding the specific<br>portions of the transcript are intended |
| 20       |                             |                         |                                   | to be used.   |
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| 1<br>2<br>3 | Document                       | Party Seeking<br>to Introduce<br>Exhibit | Information Requested for <i>In</i> Camera Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|-------------|--------------------------------|--|--|---|
|             | PX7042 (Lawver                 | FTC's Exhibit                            | Transcript   | This deposition transcript contains   |
| 5           | Dep. Tr.)                      | List                                     | Withheld   | non-public and highly sensitive information, including, but not limited   |
| 6           |                                |  |  | to, internal decision-making processes, investment decisions,   |
| 7           |                                |  |  | strategic evaluation of forward-<br>looking opportunities, market share   |
| 8           |                                |  |  | analyses, assessment of the competitive landscape, and internal   |
| 9           |                                |  |  | discussions of business strategy, which could be used to injure   |
| 10          |                                |  |  | Microsoft if made publicly available. Microsoft proposes the parties meet   |
| 11          |                                |  |  | and confer regarding the specific portions of the transcript are intended   |
| 12          | DV7042 (L                      | ETC2 - E-1.11.4                          | Tuesday  | to be used.   |
| 13          | PX7043 (Lawver Corp. Rep. Dep. | FTC's Exhibit<br>List                    | Transcript<br>Withheld                               | This deposition transcript contains non-public and highly sensitive information, including, but not limited         |
| 14          | Tr.)                           |  |  | to, internal decision-making processes, investment decisions,   |
| 15          |                                |  |  | strategic evaluation of forward-<br>looking opportunities, market share   |
| 16          |                                |  |  | analyses, assessment of the competitive landscape, and internal   |
| 17          |                                |  |  | discussions of business strategy, which could be used to injure   |
| 18          |                                |  |  | Microsoft if made publicly available.   |
| 19          |                                |  |  | Microsoft proposes the parties meet<br>and confer regarding the specific<br>portions of the transcript are intended |
| 20          |                                |  |  | to be used.   |
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| 1        | Document          | Party Seeking<br>to Introduce | Information<br>Requested for <i>In</i> | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|-------------------|-------------------------------|--|---|
| 2        |                   | Exhibit                       | Camera Treatment                       | Request   |
| 3   4    | PX7044 (Bond Dep. | FTC's Exhibit                 | Transcript                             | This deposition transcript contains   |
| 5        | Tr.)              | List                          | Withheld                               | non-public and highly sensitive information, including, but not limited                                     |
| 6        |                   |                               |  | to, internal decision-making processes, investment decisions,   |
| 7        |                   |                               |  | strategic evaluation of forward-<br>looking opportunities, market share                                     |
| 8        |                   |                               |  | analyses, assessment of the competitive landscape, and internal   |
| 9        |                   |                               |  | discussions of business strategy, which could be used to injure   |
| 10       |                   |                               |  | Microsoft if made publicly available. Microsoft proposes the parties meet and confer regarding the specific |
| 11       |                   |                               |  | portions of the transcript are intended to be used.   |
| 12       | PX7046 (Leder     | FTC's Exhibit                 | Transcript                             | This deposition transcript contains   |
| 13       | Dep. Tr.)         | List                          | Withheld                               | non-public and highly sensitive information, including, but not limited                                     |
| 14       |                   |                               |  | to, internal decision-making processes, investment decisions,   |
| 15       |                   |                               |  | strategic evaluation of forward-<br>looking opportunities, market share                                     |
| 16       |                   |                               |  | analyses, assessment of the competitive landscape, and internal   |
| 17       |                   |                               |  | discussions of business strategy, which could be used to injure   |
| 18       |                   |                               |  | Microsoft if made publicly available.  Microsoft proposes the parties meet                                  |
| 19       |                   |                               |  | and confer regarding the specific portions of the transcript are intended to be used.                       |
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| 1 2      | Document                     | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i> | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|------------------------------|--|---|---|
| 3        |                              |  | Treatment   |   |
| 4        | PX7047 (Schwarz<br>Dep. Tr.) | FTC's Exhibit<br>List                    | Transcript Withheld                                     | This deposition transcript contains non-public and highly sensitive   |
| 5        |                              |  |   | information, including, but not limited to, internal decision-making processes, investment decisions,               |
| 6        |                              |  |   | strategic evaluation of forward-<br>looking opportunities, market share   |
| 7        |                              |  |   | analyses, assessment of the competitive landscape, and internal   |
| 8 9      |                              |  |   | discussions of business strategy, which could be used to injure   |
| 10       |                              |  |   | Microsoft if made publicly available.  Microsoft proposes the parties meet  |
| 11       |                              |  |   | and confer regarding the specific portions of the transcript are intended to be used.                               |
| 12       | PX7048 (Booty                | FTC's Exhibit                            | Transcript  | This deposition transcript contains   |
| 13       | Dep. Tr.)                    | List                                     | Withheld  | non-public and highly sensitive information, including, but not limited   |
| 14       |                              |  |   | to, internal decision-making processes, investment decisions,   |
| 15       |                              |  |   | strategic evaluation of forward-<br>looking opportunities, market share<br>analyses, assessment of the              |
| 16<br>17 |                              |  |   | competitive landscape, and internal discussions of business strategy,   |
| 18       |                              |  |   | which could be used to injure Microsoft if made publicly available.   |
| 19       |                              |  |   | Microsoft proposes the parties meet<br>and confer regarding the specific<br>portions of the transcript are intended |
| 20       |                              |  |   | to be used.   |
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| 1 2 | Document                | Party Seeking<br>to Introduce<br>Exhibit | Information Requested for <i>In</i> Camera Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>                 |
|-----|-------------------------|--|--|---|
| 3   | DY/20 10 (IV)           | ETC. F. 1.11.                            |  |   |
| 4   | PX7049 (Hines Dep. Tr.) | FTC's Exhibit<br>List                    | Transcript Withheld                                  | This deposition transcript contains non-public and highly sensitive       |
| 5   |                         |  |  | information, including, but not limited to, internal decision-making      |
| 6   |                         |  |  | processes, investment decisions, strategic evaluation of forward-         |
| 7   |                         |  |  | looking opportunities, market share analyses, assessment of the           |
| 8   |                         |  |  | competitive landscape, and internal discussions of business strategy,     |
| 9   |                         |  |  | which could be used to injure Microsoft if made publicly available.       |
| 10  |                         |  |  | Microsoft proposes the parties meet and confer regarding the specific     |
| 11  |                         |  |  | portions of the transcript are intended to be used.                       |
| 12  | PX7050 (Choudhry        | FTC's Exhibit                            | Transcript   | This deposition transcript contains                                       |
| 13  | Dep. Tr.)               | List                                     | Withheld   | non-public and highly sensitive information, including, but not limited   |
| 14  |                         |  |  | to, internal decision-making processes, investment decisions,             |
| 15  |                         |  |  | strategic evaluation of forward-<br>looking opportunities, market share   |
| 16  |                         |  |  | analyses, assessment of the competitive landscape, and internal           |
| 17  |                         |  |  | discussions of business strategy, which could be used to injure           |
| 18  |                         |  |  | Microsoft if made publicly available. Microsoft proposes the parties meet |
| 19  |                         |  |  | and confer regarding the specific portions of the transcript are intended |
| 20  |                         |  |  | to be used.   |
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| 1        |                            |  |                                     |   |
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| 2        | Document                   | Party Seeking<br>to Introduce<br>Exhibit | Information Requested for In Camera | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
| 3        |                            |  | Treatment                           |   |
| 4        | PX7051 (Peterson Dep. Tr.) | FTC's Exhibit<br>List                    | Transcript<br>Withheld              | This deposition transcript contains<br>non-public and highly sensitive<br>information, including, but not limited |
| 5        |                            |  |                                     | to, internal decision-making processes, investment decisions,   |
| 6        |                            |  |                                     | strategic evaluation of forward-looking opportunities, market share   |
| 7 8      |                            |  |                                     | analyses, assessment of the competitive landscape, and internal   |
| 9        |                            |  |                                     | discussions of business strategy, which could be used to injure   |
| 10       |                            |  |                                     | Microsoft if made publicly available.  Microsoft proposes the parties meet  |
| 11       |                            |  |                                     | and confer regarding the specific portions of the transcript are intended to be used.                             |
| 12       | PX7055 (Wright             | FTC's Exhibit                            | Transcript                          | This deposition transcript contains   |
| 13       | Dep. Tr.)                  | List                                     | Withheld                            | non-public and highly sensitive information, including, but not limited   |
| 14       |                            |  |                                     | to, internal decision-making processes, investment decisions,   |
| 15       |                            |  |                                     | strategic evaluation of forward-<br>looking opportunities, market share   |
| 16       |                            |  |                                     | analyses, assessment of the competitive landscape, and internal discussions of business strategy,                 |
| 17       |                            |  |                                     | which could be used to injure Microsoft if made publicly available.   |
| 18       |                            |  |                                     | Microsoft proposes the parties meet<br>and confer regarding the specific  |
| 19<br>20 |                            |  |                                     | portions of the transcript are intended to be used.   |
| 21       |                            |  |                                     |   |
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| 1     | Document        | Party Seeking to Introduce | Information<br>Requested for <i>In</i> | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|-------|-----------------|----------------------------|--|---|
| 2   3 |                 | Exhibit                    | Camera<br>Treatment                    |   |
| 4     | PX7056 (Murphy  | FTC's Exhibit<br>List      | Transcript                             | This deposition transcript contains   |
| 5     | Dep. Tr.)       | List                       | Withheld                               | non-public and highly sensitive information, including, but not limited                             |
| 6     |                 |                            |  | to, internal decision-making processes, investment decisions, strategic evaluation of forward-      |
| 7   8 |                 |                            |  | looking opportunities, market share analyses, assessment of the competitive landscape, and internal |
| 9     |                 |                            |  | discussions of business strategy, which could be used to injure                                     |
| 10    |                 |                            |  | Microsoft if made publicly available. Microsoft proposes the parties meet                           |
| 11    |                 |                            |  | and confer regarding the specific portions of the transcript are intended to be used.               |
| 12    | PX7057 (Wright  | FTC's Exhibit              | Transcript                             | This deposition transcript contains   |
| 13    | Corp. Rep. Dep. | List                       | Withheld                               | non-public and highly sensitive information, including, but not limited                             |
| 14    |                 |                            |  | to, internal decision-making processes, investment decisions,                                       |
| 15    |                 |                            |  | strategic evaluation of forward-<br>looking opportunities, market share                             |
| 16    |                 |                            |  | analyses, assessment of the competitive landscape, and internal                                     |
| 17    |                 |                            |  | discussions of business strategy, which could be used to injure                                     |
| 18    |                 |                            |  | Microsoft if made publicly available. Microsoft proposes the parties meet                           |
| 19    |                 |                            |  | and confer regarding the specific portions of the transcript are intended                           |
| 20    |                 | ETC2                       | Cumplemental Ewhil                     | to be used.   |
| 21    |                 |                            | Supplemental Exhib                     |   |
| 22    | PX1006          | FTC's Supplemental         | Redacted Version<br>Forthcoming        | This portion contains non-public and highly sensitive information                                   |
| 23    |                 | Exhibit List               |  | including, but not limited to assessment of the competitive   |
| 24    |                 |                            |  | landscape, which could be used to injure Microsoft if made publicly                                 |
| 25    |                 |                            |  | available.  |
| 26    |                 |                            |  |   |
| 27    |                 |                            |  |   |

| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|--|--|---|
| PX1013   | FTC's<br>Supplemental<br>Exhibit List    | Redacted Version<br>Forthcoming                                      | This portion contains non-public a highly sensitive information including, but not limited to interr decision-making processes, which could be used to injure Microsoft made publicly available.  |
| PX1994   | FTC's<br>Supplemental<br>Exhibit List    | Document<br>Withheld   | This portion contains non-public a highly sensitive information including, but not limited to terms existing confidential agreements, which could be used to injure Microsoft if made publicly available.                                       |
| PX4098   | FTC's<br>Supplemental<br>Exhibit List    | Redacted Version<br>Forthcoming                                      | This portion contains non-public a highly sensitive information including, but not limited to intern decision-making processes and assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available. |
| PX4109   | FTC's<br>Supplemental<br>Exhibit List    | Document<br>Withheld   | This portion contains non-public a highly sensitive information including, but not limited to busin partnerships and strategic evaluati of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.   |
| PX4120   | FTC's<br>Supplemental<br>Exhibit List    | Redacted Version<br>Forthcoming                                      | This portion contains non-public a highly sensitive information including, but not limited to reven figures and projections and internated decision-making processes, which could be used to injure Microsoft made publicly available.          |
| PX4124   | FTC's<br>Supplemental<br>Exhibit List    | Document<br>Withheld   | This portion contains non-public a highly sensitive information including, but not limited to busin partnerships, which could be used injure Microsoft if made publicly available.  |

| 1 2        | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br>Camera | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|------------|----------|--|--|---|
| 3          |          |  | Treatment  |   |
| 4<br>5     | PX4130   | FTC's<br>Supplemental<br>Exhibit List    | Redacted Version<br>Forthcoming                  | This portion contains non-public and highly sensitive information including, but not limited to business partnerships, which could be used to |
| 6          |          |  |  | injure Microsoft if made publicly available.  |
| 7 8        | PX4145   | FTC's<br>Supplemental                    | Document<br>Withheld                             | This portion contains non-public and highly sensitive information   |
| 9          |          | Exhibit List                             |  | including, but not limited to business<br>partnerships, terms of existing<br>confidential agreements, and revenue                             |
| 10         |          |  |  | figures and projections, which could<br>be used to injure Microsoft if made<br>publicly available.  |
| 11         | DX 4200  | ETC:                                     | D  | 1   |
| 12         | PX4289   | FTC's<br>Supplemental<br>Exhibit List    | Document<br>Withheld                             | This portion contains non-public and highly sensitive information including, but not limited to   |
| 14         |          |  |  | assessment of the competitive landscape, which could be used to injure Microsoft if made publicly   |
| 15         |          |  |  | available.  |
| 16         | PX4694   | FTC's<br>Supplemental                    | Redacted Version<br>Forthcoming                  | This portion contains non-public and highly sensitive information   |
| 17         |          | Exhibit List                             | Fortilcoming                                     | including, but not limited to strategic evaluation of forward-looking   |
| 18         |          |  |  | opportunities, which could be used to injure Microsoft if made publicly   |
| 19         |          |  |  | available.  |
| 20         | PX4712   | FTC's<br>Supplemental                    | Redacted Version<br>Forthcoming                  | This portion contains non-public and highly sensitive information   |
| 21         |          | Exhibit List                             |  | including, but not limited to assessment of the competitive   |
| 22   23    |          |  |  | landscape and market share analyses,<br>which could be used to injure<br>Microsoft if made publicly available.                                |
|            | PX4725   | FTC's                                    | Document   | This portion contains non-public and  |
| 24         | 1237/25  | Supplemental Exhibit List                | Withheld   | highly sensitive information including, but not limited to terms of   |
| 25<br>26   |          |  |  | existing confidential agreements, which could be used to injure   |
| 27         |          |  |  | Microsoft if made publicly available.   |
| <i>- 1</i> |          |  |  |   |

| Document      | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|---------------|--|--|---|
| PX4768        | FTC's<br>Supplemental<br>Exhibit List    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to terms of existing confidential agreements and business partnerships, which could be used to injure Microsoft if made publicly available.                                    |
| PX4898        | FTC's<br>Supplemental<br>Exhibit List    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to strategic evaluation of forward-looking opportunities, investment decisions, and business partnerships, which could be used to injure Microsoft if made publicly available. |
| PX4899        | FTC's<br>Supplemental<br>Exhibit List    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.              |
| PX4900        | FTC's<br>Supplemental<br>Exhibit List    | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.              |
|               | D  | efendants' Exhibit L   | List  |
| RX1058/RX1258 | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available.   |
|               |  |  | 1   |

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| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment                         | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|--|--|---|
| RX3104   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming  | This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available. |
| RX1060   | Defendants'<br>Exhibit List              | Parent Document<br>Non-Confidential<br>/ Redacted<br>Version of<br>Attachment<br>Forthcoming | This portion contains non-public and highly sensitive information including, but not limited to, assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.   |
| RX1061   | Defendants'<br>Exhibit List              | Parent Document<br>Non-Confidential<br>/ Redacted<br>Version of<br>Attachment<br>Forthcoming | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.           |
| RX1062   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.           |
| RX1064   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.   |
| RX1065   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming  | This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available.                     |
|          |  | 1  | 1   |

| 1<br>2<br>3                     | Document | Party Seeking<br>to Introduce<br>Exhibit | Information Requested for <i>In</i> Camera Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|---------------------------------|----------|--|--|--|
| 4<br>5<br>6                     | RX1067   | Defendants'<br>Exhibit List              | Document<br>Withheld                                 | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.  |
| 7<br>8<br>9<br>10<br>11         | RX1074   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming                      | This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities and internal decision-making processes, which could be used to injure Microsoft if made publicly available. |
| 12<br>13<br>14<br>15            | RX1077   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming                      | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.  |
| 16<br>17<br>18                  | RX1078   | Defendants'<br>Exhibit List              | Document<br>Withheld                                 | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.  |
| 19<br>20<br>21<br>22            | RX1079   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming                      | This portion contains non-public and highly sensitive information including, but not limited to revenue figures and projections and investment decisions, which could be used to injure Microsoft if made publicly available.                                      |
| 23<br>24<br>25<br>26            | RX1080   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming                      | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.  |
| <ul><li>26</li><li>27</li></ul> |          | 1  |  | ,  |

| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|--|--|---|
| RX1082   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections and investment decisions, which could be used to injure Microsoft if made publicly available.                              |
| RX1085   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.                                   |
| RX1086   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available.   |
| RX3105   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to, assessment of the competitive landscape and terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available. |
| RX1088   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements and revenue figures and projections, which could be used to injure Microsoft if made publicly available.         |
| PX4044   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes and business partnerships, which could be used to injure Microsoft if made publicly available.                          |

AMENDED ADMIN MOTION SEEKING IN CAMERA TREATMENT

| 1 2 3    | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|----------|--|--|---|
|          | RX1089   | Defendants'                              | Document   | This portion contains non-public and  |
| 4        |          | Exhibit List                             | Withheld   | highly sensitive information including, but not limited to, business                                      |
| 5        |          |  |  | partnerships and terms of existing confidential agreements, which could                                   |
| 6        |          |  |  | be used to injure Microsoft if made publicly available.   |
| 7        | D1/1000  | <b>D</b> 0 1 1 1                         |  | 1   |
| 8 9      | RX1090   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, internal |
| 10       |          |  |  | decision-making processes, which could be used to injure Microsoft if made publicly available.            |
| 11       | RX5014   | Defendants'                              | Document   | This portion contains non-public and  |
| 12       |          | Exhibit List                             | Withheld   | highly sensitive information including, but not limited to, business                                      |
| 13<br>14 |          |  |  | partnerships, which could be used to injure Microsoft if made publicly available.                         |
|          | RX1093   | Defendants'                              | Document   | This portion contains non-public and  |
| 15<br>16 |          | Exhibit List                             | Withheld   | highly sensitive information including, but not limited to, strategic evaluation of forward-looking       |
| 17       |          |  |  | opportunities, which could be used to injure Microsoft if made publicly                                   |
| 18       |          |  |  | available.  |
| 19       | RX1094   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming                                      | This portion contains non-public and highly sensitive information   |
| 20       |          | 2.1.1.0.10 2.2.00                        | 1 01 1110 0 111111 g   | including, but not limited to, terms of existing confidential agreements,                                 |
| 21       |          |  |  | which could be used to injure Microsoft if made publicly available.                                       |
| 22       | RX1095   | Defendants'                              | Redacted Version   | This portion contains non-public and  |
| 23       | 1011075  | Exhibit List                             | Forthcoming  | highly sensitive information including, but not limited to, terms of                                      |
| 24       |          |  |  | existing confidential agreements,<br>which could be used to injure  |
| 25       |          |  |  | Microsoft if made publicly available.   |
| 26       |          |  | 1  |   |
| 27       |          |  |  |   |

| 1 2                             | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br>Camera  | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|---------------------------------|----------|--|---|--|
| 3                               |          |  | Treatment   |  |
| 4                               | RX1096   | Defendants'<br>Exhibit List              | Parent Document<br>Non-Confidential<br>/ Redacted | This portion contains non-public and highly sensitive information including, but not limited to, revenue |
| 5                               |          |  | Version of<br>Attachment                          | figures and projections and assessment of the competitive  |
| 6<br>7                          |          |  | Forthcoming                                       | landscape, which could be used to injure Microsoft if made publicly available.                           |
| 8                               | PX4215   | Defendants'                              | Document  | This portion contains non-public and   |
| 9                               | 17.1213  | Exhibit List                             | Withheld  | highly sensitive information including, but not limited to, internal decision-making processes, which    |
| 10                              |          |  |   | could be used to injure Microsoft if made publicly available.  |
| 11                              | RX1097   | Defendants'                              | Redacted Version                                  | 1 1  |
| 12                              | KA1097   | Exhibit List                             | Forthcoming                                       | This portion contains non-public and highly sensitive information including, but not limited to,         |
| 13                              |          |  |   | assessment of the competitive landscape, which could be used to  |
| <ul><li>14</li><li>15</li></ul> |          |  |   | injure Microsoft if made publicly available.   |
| 16                              | RX1098   | Defendants'<br>Exhibit List              | Redacted Version                                  | This portion contains non-public and   |
| 17                              |          | Exhibit List                             | Forthcoming                                       | highly sensitive information including, but not limited to, internal decision-making processes, which    |
| 18                              |          |  |   | could be used to injure Microsoft if made publicly available.  |
| 19                              | RX1099   | Defendants'                              | Attachment  | This portion contains non-public and   |
| 20                              |          | Exhibit List                             | Withheld / Redacted Version                       | highly sensitive information including, but not limited to, terms of                                     |
| 21                              |          |  | of Parent<br>Forthcoming                          | existing confidential agreements, which could be used to injure  |
| 22                              |          |  |   | Microsoft if made publicly available.  |
| 23                              | RX1100   | Defendants'<br>Exhibit List              | Document<br>Withheld                              | This portion contains non-public and highly sensitive information  |
| 24                              |          |  |   | including, but not limited to internal decision-making processes and                                     |
| 25                              |          |  |   | assessment of the competitive landscape, which could be used to  |
| 26                              |          |  |   | injure Microsoft if made publicly available.   |
| 27                              |          |  |   |  |

AMENDED ADMIN MOTION SEEKING IN CAMERA TREATMENT

| 1<br>2<br>3  | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment     | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|--|----------|--|--|---|
| 4<br>5<br>6<br>7   | RX1102   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming  | This portion contains non-public and highly sensitive information including, but not limited to, business partnerships and strategic evaluation of forward looking opportunities, which could be used to injure Microsoft if made publicly available.                               |
| 8<br>9<br>10   | RX1103   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming  | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.   |
| 11<br>12<br>13<br>14   | RX1104   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming  | This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.   |
| 15<br>16<br>17<br>18<br>19                                       | RX1105   | Defendants'<br>Exhibit List              | Parent Non-<br>Confidential /<br>Redacted<br>Attachment<br>Forthcoming   | This portion contains non-public and highly sensitive information including, but not limited to, investment decisions and strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.                                |
| <ul><li>20</li><li>21</li><li>22</li><li>23</li><li>24</li></ul> | RX1106   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming  | This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities and internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available. |
| <ul><li>25</li><li>26</li><li>27</li><li>28</li></ul>            | RX1108   | Defendants'<br>Exhibit List              | Attachment<br>Withheld /<br>Redacted Version<br>of Parent<br>Forthcoming | This portion contains non-public and highly sensitive information including, but not limited to, internal decision-making processes, which could be used to injure Microsoft if made publicly available.  |

| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment     | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|--|--|---|
| RX1111   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming  | This portion contains non-public and highly sensitive information including, but not limited to, investment decisions and business partnerships, which could be used to injure Microsoft if made publicly available.  |
| RX1112   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming  | This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities and internal presentations discussing business strategy and assessment of the competitive landscape, which could be used to injure Microsoft if made publicly available. |
| RX1113   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming  | This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.   |
| RX1142   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming  | This portion contains non-public and highly sensitive information including, but not limited to, investment decisions, which could b used to injure Microsoft if made publicly available.   |
| RX1117   | Defendants'<br>Exhibit List              | Attachment<br>Withheld /<br>Redacted Version<br>of Parent<br>Forthcoming | This portion contains non-public and highly sensitive information including, but not limited to, investment decisions and revenue figures and projections, which could be used to injure Microsoft if made publicly available.  |
| RX1119   | Defendants'<br>Exhibit List              | Document<br>Withheld /<br>Redacted Version<br>Forthcoming                | This portion contains non-public and highly sensitive information including, but not limited, to internal decision-making processes, which could be used to injure Microsoft if made publicly available.  |

| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment           | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|----------|--|--|--|
| RX1121   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming  | This portion contains non-public and highly sensitive information including, but not limited to, investment decisions and revenue figures and projections, which could be used to injure Microsoft if made publicly available. |
| RX1122   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, terms o existing confidential agreements, which could be used to injure Microsoft if made publicly available                  |
| PX1829   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, investment decisions, which could be used to injure Microsoft if made publicly available.                                     |
| RX1123   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.                          |
| RX5013   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projection, which could bused to injure Microsoft if made publicly available.                             |
| RX1125   | Defendants'<br>Exhibit List              | Parent Document<br>Non-Confidential<br>/ Redacted<br>Attachment<br>Forthcoming | This portion contains non-public and highly sensitive information including, but not limited to, internal presentations, discussing business strategy, which could be used to injure Microsoft if made publicly available.     |

AMENDED ADMIN MOTION SEEKING IN CAMERA TREATMENT

| 1<br>2<br>3  | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment  | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|--|----------|--|---|--|
| 4<br>5<br>6  | RX1128   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming                                       | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.  |
| 7<br>8<br>9<br>10  | RX1130   | Defendants'<br>Exhibit List              | Document<br>Withheld  | This portion contains non-public and highly sensitive information including, but not limited to business partnerships and terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available.                                 |
| 11<br>12<br>13<br>14<br>15   | RX1132   | Defendants'<br>Exhibit List              | Document<br>Withheld  | This portion contains non-public and highly sensitive information including, but not limited to investment decisions and strategic evaluation of forward-looking opportunities, which could be used to injure Microsoft if made publicly available.                      |
| 16<br>17<br>18<br>19   | RX1133   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming                                       | This portion contains non-public and highly sensitive information including, but not limited to, strategic evaluation of forward-looking opportunities and internal discussion of business strategy, which could be used to injure Microsoft if made publicly available. |
| <ul> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ul> | RX1134   | Defendants'<br>Exhibit List              | Attachment Withheld / Redacted Version of Parent Document Forthcoming | This portion contains non-public and highly sensitive information including, but not limited to, internal presentations discussing business strategy, which could be used to injure Microsoft if made publicly available.  |
| <ul><li>24</li><li>25</li><li>26</li><li>27</li><li>28</li></ul>       | RX1137   | Defendants'<br>Exhibit List              | Document<br>Withheld  | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.  |

| 1<br>2<br>3 | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|-------------|----------|--|--|---|
| 4           | RX1140   | Defendants'                              | Document Non-  | This portion contains non-public and  |
| 5           |          | Exhibit List                             | Confidential / Redacted Version                                      | highly sensitive information including, but not limited to, revenue   |
| 6           |          |  | Forthcoming  | figures and projections, which could<br>be used to injure Microsoft if made<br>publicly available.            |
| 7           | RX1141   | Defendants'                              | Document Non-  | This portion contains non-public and  |
| 8           |          | Exhibit List                             | Confidential /<br>Redacted Version                                   | highly sensitive information including, but not limited to, strategic   |
| 9           |          |  | Forthcoming  | evaluation of forward-looking opportunities, which could be used to   |
| 10          |          |  |  | injure Microsoft if made publicly available.  |
| 11          | RX1116   | Defendants'                              | Document Non-<br>Confidential /                                      | This portion contains non-public and  |
| 12          |          | Exhibit List                             | Redacted Version   | highly sensitive information including, but not limited to, strategic   |
| 13          |          |  | Forthcoming  | evaluation of forward-looking<br>opportunities and revenue figures and<br>projections, which could be used to |
| 14<br>15    |          |  |  | injure Microsoft if made publicly available.  |
| 16          | RX1144   | Defendants'                              | Redacted Version   | This portion contains non-public and  |
| 17          |          | Exhibit List                             | Forthcoming  | highly sensitive information including, but not limited to, strategic   |
| 18          |          |  |  | evaluation of forward-looking opportunities and revenue figures and   |
| 19          |          |  |  | projections, which could be used to injure Microsoft if made publicly available.                              |
| 20          | RX1146   | Defendants'                              | Redacted Version   | This portion contains non-public and  |
| 21          | KA1140   | Exhibit List                             | Forthcoming  | highly sensitive information including, but not limited to, business  |
| 22          |          |  |  | partnerships, which could be used to injure Microsoft if made publicly  |
| 23          |          |  |  | available.  |
| 24          | RX5011   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information   |
| 25          |          | LAMOR LIST                               | Widificia  | including, but not limited to, revenue figures and projections, which could                                   |
| 26          |          |  |  | be used to injure Microsoft if made publicly available.   |
| 27          |          |  |  | paonory available.  |

| 1<br>2<br>3 | Document      | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|-------------|---------------|--|--|--|
| 4           | RX1152        | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information  |
| 5           |               |  |  | including, but not limited to, revenue figures and projections and internal decision-making processes, which |
| 6<br>7      |               |  |  | could be used to injure Microsoft if made publicly available.  |
| 8           | RX1154        | Defendants'<br>Exhibit List              | Parent Document<br>Non-Confidential                                  | This portion contains non-public and highly sensitive information  |
| 9           |               | Exmon Eist                               | / Redacted<br>Version of   | including, but not limited to, internal presentations discussing business                                    |
| 10          |               |  | Attachment<br>Forthcoming  | strategy and revenue figures and projections and terms of existing   |
| 11          |               |  |  | confidential agreements, which could<br>be used to injure Microsoft if made<br>publicly available.           |
| 12          | RX1155        | Defendants'                              | Parent Document  | This portion contains non-public and   |
| 13<br>14    |               | Exhibit List                             | Non-Confidential / Redacted  | highly sensitive information including, but not limited to, strategic  |
| 15          |               |  | Version of<br>Attachment<br>Forthcoming                              | evaluation of forward-looking opportunities, revenue figures and projections, and investment decisions,      |
| 16          |               |  | T orangeming   | which could be used to injure Microsoft if made publicly available.  |
| 17          | RX1156        | Defendants'                              | Document   | This portion contains non-public and   |
| 18          |               | Exhibit List                             | Withheld   | highly sensitive information including, but not limited to, strategic evaluation of forward-looking          |
| 19<br>20    |               |  |  | opportunities, revenue figures and projections, and investment decisions,                                    |
| 21          |               |  |  | which could be used to injure Microsoft if made publicly available.  |
| 22          | RX3166/RX5003 | Defendants'                              | Document   | This portion contains non-public and   |
| 23          |               | Exhibit List                             | Withheld   | highly sensitive information including, but not limited to, internal presentations discussing business       |
| 24          |               |  |  | strategy, which could be used to injure Microsoft if made publicly   |
| 25          |               |  |  | available.   |
| 26          |               |  |  |  |
| 27          |               |  |  |  |

| 1 2      | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i> | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|----------|----------|--|---|--|
| 3        |          |  | Treatment   |  |
| 4        | RX3106   | Defendants'<br>Exhibit List              | Document<br>Withheld                                    | This portion contains non-public and highly sensitive information  |
| 5        |          |  |   | including, but not limited to, strategic evaluation of forward-looking opportunities, which could be used to |
| 7        |          |  |   | injure Microsoft if made publicly available.   |
| 8        | RX1161   | Defendants'<br>Exhibit List              | Parent Document<br>Non-Confidential<br>/ Redacted       | This portion contains non-public and highly sensitive information including, but not limited to, terms of    |
| 9        |          |  | Version of<br>Attachment                                | existing confidential agreements, which could be used to injure  |
| 10       |          |  | Forthcoming   | Microsoft if made publicly available.  |
| 11<br>12 | RX1165   | Defendants'<br>Exhibit List              | Document<br>Withheld                                    | This portion contains non-public and highly sensitive information  |
| 13       |          |  |   | including, but not limited to, strategic evaluation of forward-looking opportunities and internal decision-  |
| 14       |          |  |   | making processes, which could be used to injure Microsoft if made  |
| 15       |          |  |   | publicly available.  |
| 16       | RX1173   | Defendants'<br>Exhibit List              | Parent Document<br>Non-Confidential                     | This portion contains non-public and highly sensitive information  |
| 17       |          |  | / Attachment Withheld                                   | including, but not limited to, revenue figures and projections, which could                                  |
| 18       |          |  |   | be used to injure Microsoft if made publicly available.  |
| 19<br>20 | RX1175   | Defendants'<br>Exhibit List              | Document<br>Withheld                                    | This portion contains non-public and highly sensitive information  |
| 21       |          |  |   | including, but not limited to, revenue figures and projections and strategic                                 |
| 22       |          |  |   | evaluation of forward-looking opportunities, which could be used to  |
| 23       |          |  |   | injure Microsoft if made publicly available.   |
| 24       | RX1176   | Defendants'                              | Document  | This portion contains non-public and   |
| 25       |          | Exhibit List                             | Withheld  | highly sensitive information including, but not limited to, revenue  |
| 26       |          |  |   | figures and projections and strategic evaluation of forward-looking  |
| 27       |          |  |   | opportunities, which could be used to injure Microsoft if made publicly available.                           |
| 28       |          |  |   | available.   |

| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|----------|--|--|--|
| RX1178   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, reven figures and projections and internat decision-making processes, which could be used to injure Microsoft it made publicly available. |
| RX1181   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public at highly sensitive information including, but not limited to, intern decision-making processes, which could be used to injure Microsoft it made publicly available.                                      |
| RX5012   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public a highly sensitive information including, but not limited to, interpresentations discussing business strategy, which could be used to injure Microsoft if made publicly available.                        |
| RX3107   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public a highly sensitive information including, but not limited to, reven figures and projections, which cou be used to injure Microsoft if made publicly available.  |
| RX1183   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public at highly sensitive information including, but not limited to, intern decision-making processes, which could be used to injure Microsoft it made publicly available.                                      |
| RX1184   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public a highly sensitive information including, but not limited to, terms existing confidential agreements, which could be used to injure Microsoft if made publicly availab                                    |

| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment                         | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|--|--|---|
| PX1774   | Defendants'<br>Exhibit List              | Parent Document<br>Non-Confidential<br>/ Redacted<br>Version of<br>Attachment<br>Forthcoming | This portion contains non-public and highly sensitive information including, but not limited to, internal presentations discussing business strategy and revenue figures and projections, which could be used to injure Microsoft if made publicly available. |
| RX1186   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.   |
| RX1187   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.   |
| RX1325   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.   |
| PX4033   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.   |
| PX4028   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made publicly available.   |

| 1 2      | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i> | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|----------|--|---|---|
| 3        |          |  | Treatment   |   |
| 4        | RX1193   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming                         | This portion contains non-public and highly sensitive information   |
| 5        |          |  |   | including, but not limited to, revenue figures and projections, which could be used to injure Microsoft if made |
| 6        |          |  |   | publicly available.   |
| 7<br>8   | RX1198   | Defendants'<br>Exhibit List              | Document<br>Withheld                                    | This portion contains non-public and highly sensitive information   |
| 9        |          |  |   | including, but not limited to, revenue figures and projections and assessment of the competitive                |
| 10       |          |  |   | landscape, which could be used to injure Microsoft if made publicly available.                                  |
| 11       | 7711000  | <b>D</b> 0 1 1                           |   |   |
| 12       | RX1200   | Defendants'<br>Exhibit List              | Document Withheld / Redacted Version                    | This portion contains non-public and highly sensitive information including, but not limited to, terms of       |
| 13<br>14 |          |  | Forthcoming   | existing confidential agreements, which could be used to injure   |
| 15       |          |  |   | Microsoft if made publicly available.   |
| 16       | RX3019   | Defendants'<br>Exhibit List              | Document<br>Withheld                                    | This portion contains non-public and highly sensitive information including, but not limited to, terms of       |
| 17       |          |  |   | existing confidential agreements, which could be used to injure Microsoft if made publicly available.           |
| 18       |          |  |   |   |
| 19       | RX1202   | Defendants'<br>Exhibit List              | Document Withheld / Redacted Version                    | This portion contains non-public and highly sensitive information including, but not limited to, strategic      |
| 20       |          |  | Forthcoming   | evaluation of forward-looking   |
| 21 22    |          |  |   | opportunities, which could be used to injure Microsoft if made publicly available.                              |
| 23       | RX1209   | Defendants'                              | Parent Document   | This portion contains non-public and  |
| 24       |          | Exhibit List                             | Non-Confidential / Redacted Version of                  | highly sensitive information including, but not limited to, revenue   |
| 25       |          |  | Version of<br>Attachment<br>Forthcoming                 | figures and projections, which could<br>be used to injure Microsoft if made<br>publicly available.              |
| 26       |          |  | 1 of the offiling                                       | publicly available.   |
| 27       |          |  |   |   |

| <b>D</b> | Oocument | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|----------|--|--|---|
|          | RX1211   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available. |
| R        | RX1212   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available. |
| ,        | RX1213   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available. |
| R        | RX1215   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available. |
|          | RX1217   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available. |
| R        | RX1221   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available. |
| R        | RX1222   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, terms of existing confidential agreements, which could be used to injure Microsoft if made publicly available. |

| 1 2 3    | Document | Party Seeking<br>to Introduce<br>Exhibit | Information Requested for <i>In</i> Camera Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|----------|--|--|---|
| 4        | RX1321   | Defendants'<br>Exhibit List              | Document<br>Withheld                                 | This portion contains non-public and highly sensitive information   |
| 5        |          |  |  | including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly        |
| 6        |          |  |  | available.  |
| 7<br>8   | RX5002   | Defendants'<br>Exhibit List              | Document<br>Withheld                                 | This portion contains non-public and highly sensitive information including, but not limited to, business             |
| 9        |          |  |  | partnerships, which could be used to injure Microsoft if made publicly available.                                     |
| 10       | RX1223   | Defendants'                              | Document   | This portion contains non-public and  |
| 12       |          | Exhibit List                             | Withheld   | highly sensitive information including, but not limited to, revenue   |
| 13       |          |  |  | figures and projections and investment decisions, which could be used to injure Microsoft if made publicly available. |
| 14       | RX1230   | Defendants'                              | Redacted Version                                     | This portion contains non-public and  |
| 15<br>16 | 1011250  | Exhibit List                             | Forthcoming  | highly sensitive information including, but not limited to, terms of existing confidential agreements,                |
| 17       |          |  |  | which could be used to injure Microsoft if made publicly available.   |
| 18       | RX3027   | Defendants'<br>Exhibit List              | Document<br>Withheld                                 | This portion contains non-public and highly sensitive information   |
| 19       |          | L'Amoit List                             | Withheld   | including, but not limited to, terms of existing confidential agreements,   |
| 20   21  |          |  |  | which could be used to injure Microsoft if made publicly available.   |
| 22       | RX1233   | Defendants'                              | Redacted Version                                     | This portion contains non-public and  |
| 23       |          | Exhibit List                             | Forthcoming  | highly sensitive information including, but not limited to,   |
| 24       |          |  |  | assessment of the competitive landscape, which could be used to injure Microsoft if made publicly                     |
| 25       |          |  |  | available.  |
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| 27       |          |  |  |   |

| 1 2      | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br>Camera | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>  |
|----------|----------|--|--|--|
| 3        |          | Exilibit                                 | Treatment  |  |
| 4        | RX1236   | Defendants'<br>Exhibit List              | Document<br>Withheld                             | This portion contains non-public and highly sensitive information  |
| 5        |          |  |  | including, but not limited to, strategic evaluation of forward-looking   |
| 6<br>7   |          |  |  | opportunities, which could be used to injure Microsoft if made publicly available.   |
| 8        | RX1237   | Defendants'                              | Redacted Version                                 | This portion contains non-public and   |
| 9        |          | Exhibit List                             | Forthcoming                                      | highly sensitive information including, but not limited to, strategic  |
| 10       |          |  |  | evaluation of forward-looking opportunities, which could be used to  |
| 11       |          |  |  | injure Microsoft if made publicly available.   |
| 12       | RX5001   | Defendants'<br>Exhibit List              | Redacted Version<br>Forthcoming                  | This portion contains non-public and highly sensitive information  |
| 13       |          |  | 1 orang  | including, but not limited to, internal decision-making processes and  |
| 14<br>15 |          |  |  | strategic evaluation of forward-<br>looking opportunities, which could be<br>used to injure Microsoft if made<br>publicly available. |
| 16       | RX1238   | Defendants'                              | Parent Document                                  | This portion contains non-public and   |
| 17       |          | Exhibit List                             | Non-Confidential / Attachment                    | highly sensitive information including, but not limited to, terms of   |
| 18       |          |  | Withheld   | existing confidential agreement, which could be used to injure   |
| 19       | DV1220   | D.C. 1. 4.2                              | D  | Microsoft if made publicly available.  |
| 20       | RX1239   | Defendants'<br>Exhibit List              | Document<br>Withheld                             | This portion contains non-public and highly sensitive information  |
| 21       |          |  |  | including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly                       |
| 22       |          |  |  | available.   |
| 23       | RX1241   | Defendants'<br>Exhibit List              | Document<br>Withheld                             | This portion contains non-public and highly sensitive information  |
| 24       |          | DAMOR DISC                               | W Idiniola                                       | including, but not limited to, business partnerships and terms of existing   |
| 25       |          |  |  | confidential agreements, which could<br>be used to injure Microsoft if made  |
| 26       |          |  |  | publicly available.  |
| 27       |          | l .                                      |  |  |

| 1 2      | Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|----------|--|--|---|
| 3        |          |  |  |   |
| 4        | RX1242   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, business   |
| 5        |          |  |  | partnerships and terms of existing confidential agreements, which could be used to injure Microsoft if made |
| 7        |          |  |  | publicly available.   |
| 8        | RX1243   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information   |
| 9        |          |  |  | including, but not limited to, business partnerships and terms of existing                                  |
| 10       |          |  |  | confidential agreements, which could<br>be used to injure Microsoft if made<br>publicly available.          |
| 11       |          |  |  | 1   |
| 12       | RX1244   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, terms of   |
| 13       |          |  |  | existing confidential agreements, which could be used to injure   |
|          |          |  |  | Microsoft if made publicly available.   |
| 15<br>16 | RX1245   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information   |
| 17       |          |  |  | including, but not limited to, terms of existing confidential agreements, which could be used to injure     |
| 18       |          |  |  | Microsoft if made publicly available.   |
| 19       | RX3112   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information   |
| 20       |          |  |  | including, but not limited to, terms of existing confidential agreements,                                   |
| 21       |          |  |  | which could be used to injure<br>Microsoft if made publicly available.                                      |
| 22       | PX4238   | Defendants'                              | Redacted Version   | This portion contains non-public and  |
| 23       |          | Exhibit List                             | Forthcoming  | highly sensitive information including, but not limited to, business  |
| 24       |          |  |  | partnerships, which could be used to injure Microsoft if made publicly                                      |
| 25       |          |  |  | available.  |
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| Document | Party Seeking<br>to Introduce<br>Exhibit | Information<br>Requested for <i>In</i><br><i>Camera</i><br>Treatment | Basis for <i>In Camera</i> Treatment Request <sup>1</sup>   |
|----------|--|--|---|
| RX1131   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available. |
| RX1174   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available. |
| RX3024   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available. |
| RX3025   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available. |
| RX3028   | Defendants'<br>Exhibit List              | Document<br>Withheld   | This portion contains non-public and highly sensitive information including, but not limited to, business partnerships, which could be used to injure Microsoft if made publicly available. |

#### **ARGUMENT**

## I. In Camera Treatment of the Exhibits Is Warranted Under Ninth Circuit Precedent as They Contain Microsoft's Confidential Business Information

The above-mentioned exhibits contain competitively sensitive business information and warrant in camera treatment at the evidentiary hearing. In the Ninth Circuit, "[p]arties seeking to seal judicial records relating to motions that are 'more than tangentially related to the underlying cause of action,' bear the burden of overcoming the presumption with 'compelling reasons supported by specific factual

findings that outweigh the general history of access and the public policies favoring disclosure." Lenovo (United States) Inc. v. IPCom GmbH & Co., KG, 2022 WL 2313948, at \*1 (N.D. Cal. Jun. 28, 2022); see also Kamakana v. City & County of Honolulu, 447 F.3d 1172, 1179 (9th Cir. 2006) ("[T]he court must 'conscientiously [] balance the competing interests' of the public and the party who seeks to keep certain judicial records secret.""). Courts in this Circuit regularly find that sealing is warranted where the records or information that are sought to be sealed could be used "as sources of business information that might harm a litigant's competitive standing." Nixon v. Warner Comme 'ns, Inc., 435 U.S. 589, 598 (1978); see also In re Elec. Arts, Inc., 298 F. App'x 568, 569 (9th Cir. 2008) (same); Velasco v. Chrysler Grp. LLC, 2017 WL 445241, at \*2 (C.D. Cal. Jan. 30, 2017) (stating that "district courts in this Circuit have sealed records containing 'information about proprietary business operations, a company's business mode or agreements with clients,' [and] 'internal policies and strategies'") (internal citations omitted).

"The Ninth Circuit has explained that 'in general, compelling reasons sufficient to outweigh the public's interest in disclosure and justify sealing court records exist when such court files might have become a vehicle for improper purposes, such as the use of records to ... release trade secrets." Velasco, 2017 WL 445241, at \*2 (quoting Elec. Arts, 298 F. App'x at 569); see also Elec. Arts, 298 F. App'x at 569 ("A 'trade secret may consist of any formula, pattern, device or compilation of information which is used in one's business, and which gives him an opportunity to obtain an advantage over competitors who do not know or use it."") (citation omitted). A court has "broad latitude" to grant protective orders to prevent disclosure of "many types of information, including, but not limited to, trade secrets or other confidential research, development, or commercial information." Phillips ex rel. Estates of Byrd v. Gen. Motors Corp., 307 F.3d 1206, 1211 (9th Cir. 2002).

In determining whether a document should be filed under seal, courts consider, among other things, the measures taken to guard the information's secrecy and the value of the information to the business or its competitors. E.g., Phillips ex rel. Estates of Byrd v. Gen. Motors Corp., 307 F.3d 1206, 1212 (9th Cir. 2002). Here, Microsoft seeks in camera treatment of only the exhibits on Defendants' and the FTC's exhibit lists that reference and reflect, among other things, confidential, proprietary information relating to Microsoft's internal decision-making processes, investment decisions, strategic

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evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, revenue figures and projections, and internal presentations discussing business strategy. The disclosure of this information could be used to injure Microsoft if made publicly available.

# II. In Camera Treatment of the Exhibits Is Necessary to Protect Microsoft's Confidential and Proprietary Business Information

Microsoft seeks *in camera* treatment of the above-mentioned exhibits, which contain Microsoft's non-public and highly sensitive information from documents obtained during the course of the FTC's investigation and during litigation discovery. Examples of such confidential information include, but are not limited to, Microsoft's internal decision-making processes, investment decisions, strategic evaluation of forward-looking opportunities, market share analyses, assessment of the competitive landscape, business partnerships, terms of existing confidential agreements, revenue figures and projections, and internal presentations discussing business strategy. Disclosure of this information would provide Microsoft's competitors with private data about Microsoft's performance and business strategy, which could harm Microsoft's competitive standing. *See Cont'l Auto. Sys. v. Avanci, LLC*, 2019 WL 6612012, at \*4 (N.D. Cal. Dec. 5, 2019). Thus, the unsealing of this highly confidential and sensitive information would cause injury to Microsoft that cannot be avoided through less restrictive alternatives.

Finally, Microsoft provided the FTC with confidential business information from the above-mentioned exhibits pursuant to the statutory and regulatory guarantees of confidentiality contained in the Hart-Scott-Rodino Act or the FTC Act. See 15 U.S.C. §§ 18a(h), 46(f), 57b-2(b), 57b-2(c); 6 C.F.R. § 4.10(d)-(g). In similar cases, the FTC has acknowledged the need to maintain the confidentiality of a party's confidential business information that has been provided to the FTC via a regulatory request. See, e.g., FTC v. Lockheed Martin Corp., 2022 WL 1446650, at \*2 (D.D.C. Jan. 25, 2022) ("According to the FTC, sealing the complaint is appropriate . . . because the filing includes confidential information submitted . . . pursuant to 'statutory and regulatory guarantees of confidentiality.' . . . The requested sealing covers only confidential information and is, according to the FTC, required by regulation.").

#### III. Conclusion

As stated above, compelling reasons justify Microsoft's request for in camera treatment of the 1 confidential business information contained in the above-mentioned exhibits. Microsoft therefore 2 respectfully requests that the Court grant this Motion. Redacted and unredacted versions of the Exhibits 3 warranting in camera treatment are forthcoming. In accordance with Civil Local Rule 7-11, Microsoft 4 has also filed a Proposed Order herewith. 5 6 7 Dated: June 22, 2023 Respectfully submitted, 8 By: <u>/s/ Beth Wilkinson</u> Beth Wilkinson (pro hac vice) 9 Rakesh Kilaru (pro hac vice) Kieran Gostin (pro hac vice) 10 Grace Hill (pro hac vice) Anastasia Pastan (pro hac vice) 11 Sarah Neuman (pro hac vice) 12 Alysha Bohanon (pro hac vice) Jenna Pavelec (pro hac vice) 13 WILKINSON STEKLOFF LLP 2001 M Street NW, 10th Floor 14 Washington, DC 20036 Telephone: (202) 847-4000 15 Facsimile: (202) 847-4005 16 bwilkinson@wilkinsonstekloff.com rkilaru@wilkinsonstekloff.com 17 kgostin@wilkinsonstekloff.com ghill@wilkinsonstekloff.com 18 apastan@wilkinsonstekloff.com sneuman@wilkinsonstekloff.com 19 abohanon@wilkinsonstekloff.com 20 ipavelec@wilkinsonstekloff.com 21 Bambo Obaro (Bar No. 267683) Weil, Gotshal and Manges 22 201 Redwood Shores Parkway 23 Redwood Shores, CA 94065 Telephone: (650) 802-3083 24 Facsimile: (650) 802-3100 bambo.obaro@weil.com 25 Michael Moiseyev (pro hac vice) 26 Megan A. Granger (pro hac vice) 27 WEIL, GOTSHAL &MANGES LLP 2001 M Street, NW 28 Suite 600 75

AMENDED ADMIN MOTION SEEKING IN CAMERA TREATMENT

CASE No. 3:23-cv-02880-JSC

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CAMERA TREATMENT